

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

BRUCE IBE, CONSTANCE YOUNG, JASON
MCLEAR, ROBERT FORTUNE, DEAN
HOFFMAN, KEN LAFFIN, DAVID WANTA,
and REBECCA BURGWIN,

Plaintiffs,

vs.

NATIONAL FOOTBALL LEAGUE,

Defendant.

Civil Action No. 3:11-CV-00248 M

**PLAINTIFFS' OPPOSITION TO NON-PARTIES JERRAL "JERRY" JONES
AND STEPHEN JONES' MOTIONS TO QUASH AND FOR PROTECTIVE ORDER
[DKT. NOS. 408, 427, 406, 426]¹**

¹ Counsel for The National Football League ("NFL") stated following trial on March 4, 2015 that they have no objection to either party being called to testify. Importantly, the document requests attached to both subpoenas have been withdrawn.

I. SUMMARY OF ARGUMENT

A. Messrs. Jerry and Stephen Jones Possess Highly Relevant First-Hand Information.

There can be no legitimate argument that Messrs. Jerry and Stephen Jones are not near the center of this lawsuit and the disputes between the parties. Nor can there be any legitimate argument that they do not have highly relevant first-hand information and testimony regarding the claims at issue.

For instance, the Court need not look any further than the trial transcript to see that during a mere 13 hours of *examination* (not including opening statements) across two and a half days thus far in the case, Mr. Jerry Jones' name alone has been mentioned over 83 times (7 on the first day, 42 on the second day, and 34 on the third day). Moreover, out of 36 exhibits admitted thus far during the trial (not counting another 30 exhibits pre-admitted by stipulation and not counting countless other exhibits that have been marked but not admitted), Mr. Jerry Jones' name or initials appear in 15 of them – *almost half* (Trial Exhs. 50, 52, 54, 55, 60, 73, 150, 501, 175, 166, 280, 283, 284, 290, and 370). The “Jones family” is mentioned in an additional two (Trial Exhs. 505 and 503), while the Cowboys are mentioned in six additional exhibits (Trial Exhs. 61, 119, 301, 311, 509, 510).² See Exhibit 1 attached hereto (Trial Exhs. 175 and 501 are not being included due to size but are obviously in the record). *Accordingly, unless the Court has been allowing the Plaintiffs and Defendant to both needlessly waste the valuable time of the jury by admitting irrelevant testimony and documents (and it most certainly has not), the issue as to the relevancy of the actions, communications and conduct of Messrs. Jones and Jones to these proceedings has long since been decided.*

The reasons this Court has permitted this evidence are clear. To begin with, the three central issues in the fraud case against the NFL thus far have been: (1) whether the NFL had a motive to pack Cowboy Stadium with an inappropriate number of seats to break the all-time

² Importantly, almost all of these exhibits were admitted without any objection from the NFL as to relevancy or otherwise. In some cases, the NFL was responsible for their admission.

Super Bowl attendance record; (2) whether the NFL relied on the assurances of the Jones family (including Messrs. Stephen and Jerry Jones) regarding whether the seats would be *properly* installed on time; and (3) if so, whether that reliance was reasonable in light of what the NFL knew at the time. What the NFL knew, when they knew it, how they knew it and whether they truly had sufficient reason to believe it are all highly relevant questions in this, as with any, fraud trial.

Indeed, only a few minutes into the NFL's opening statement, the NFL took the position that it had *no motive or intent* to provide its fans a sub-par experience for the Super Bowl because doing so is contrary to its business interests:

The NFL, who holds this special thing called the Super Bowl, is well aware of how special it is. And you might imagine, since they're in this business, they're very protective of the Super Bowl. And they have one goal, to make sure the experience of fans who come to the game and who watch the game have a great experience, a memorable experience.

That's what the NFL is trying to do every year.

Producing a Super Bowl that meets the NFL standards is a mammoth undertaking that takes several years to plan. It requires coordinating with federal, state and local authorities so that the fans who come are kept safe. It requires literally transforming the stadium for the unique entertainment events, the unique media needs, the unique crowds who come to the Super Bowl. It involves planning special entertainment things, aside from the game, inside the stadium and outside the stadium, including what amounts to a full-blown concert at half-time with major artists. It's like a full concert that happens in 12 minutes. That has to be done for the fan experience. And it takes the tireless work of 20,000 professionals and staff and contractors, whose job is to tie up every detail to make sure we meet the one goal, to make sure the fan experience is great.

Ladies and gentlemen, the whole premise of the argument that you just heard from plaintiffs' counsel, that the NFL, in an effort to make a few extra dollars in ticket sales or to beat an attendance record, jammed extra seats everywhere it could in the stadium without regard for the fan experience, or worse, that the NFL actually had people come from far and wide only to have them unable to watch the game, did not happen. It simply did not happen.

Not only did it happen (sic), but the NFL would never dream of having fans come from all over the country to this game with a hundred million people watching to have them have what would amount to a miserable experience.

The NFL is a big business, but it's a very simple business. It only does this. It puts on football games. It puts on football games for the pleasure and enjoyment of its fans. If its fans come and have a bad time and tell their friends that they had a bad time

and were mistreated, the NFL's business is gone. They have to meet the customer needs of fans.

March 2, 2015 Trial Transcript at 206-208.

Plaintiffs, to the contrary, maintain that the NFL's motives and intentions were not so pure. And Plaintiffs' position has been bolstered by numerous documents already admitted in this case, including emails, showing that Mr. Jerry Jones, one of the leagues' most powerful owners, exerted considerable pressure on the NFL throughout 2010 and early 2011 to assist him in breaking the attendance record only to then fail to provide the support and resources necessary to complete the temporary seats and ensure the sightlines were unobstructed. Indeed, the evidence at trial has demonstrated that the genesis of the NFL's drive and obsession to break the attendance record was the result of Mr. Jones:

Q Was the genesis for this idea of breaking the Super Bowl attendance record yours, Mr. Goodell's, somebody else at the NFL, or Jerry Jones?

A Mr. Jones was the individual who asked me to see how we could attempt to break the record.

Q He was the guy that planted the seed, right? A He was the one who asked to investigate that, yes.

Q And not only did you investigate, but you then assisted him in carrying it out, right? A Yes, sir.

Q And Mr. Goodell also got behind the plan at some point in time, didn't he? A Yes, sir.

March 3, 2015 Trial Testimony of Frank Supovitz at 201. Mr. Supovitz further testified that the seating plans that were created and are the center of this case, were created for the express purpose of satisfying Mr. Jerry Jones:

Q Now, you also testified that you created multiple seating plans to assist Mr. Jones in breaking the record, correct?

A Yes, sir.

Q So you didn't just investigate it, you were at his right side as it related to attempts to break this record, weren't you?

A As an owner of the NFL -- or a team owner of the NFL, I endeavored to try to find ways of achieving his objective of breaking the record.

Id. at 218.

Moreover, contemporaneous evidence admitted in this case demonstrates that Mr. Jones had considerable control over the attendance issue despite his counsel's and the NFL's claims to the contrary (See Exh. 50 below, No. 3 "at least open to that").

From: Supovitz, Frank </O=NFLNET/OU=NFL/CN=RECIPIENTS/CN=SPECIAL
EVENTS/CN=USERS/CN=FRANK.SUPOVITZ>
Sent: Sunday, August 8, 2010 4:00 PM
To: McConnell, Bill
</O=NFLNET/OU=NFL/CN=RECIPIENTS/CN=MCCONNELLB>; Otto, Fred
</O=NFLNET/OU=NFL/CN=RECIPIENTS/CN=OTTOF>
Subject: RE: Temporary Seating plan

As you go through this with the Cowboys tomorrow, a couple of things to know or keep in mind:

1. We had pinchpoints in Arizona's endzone, too. If it's still manageable, then we'll accept, keeping safety and comfort as our guiding principles, in that order. We're charging a lot for tickets, and making the stadium an uncomfortable space serves no one's purposes. I know I did not need to say this, but I guess I did anyway.
 2. Obstructed views have to be priced accordingly. I don't have a problem if you (Fred) think we can make the obstructed views some of the two-thousand \$500 tickets that we were going to make available for fans. That might mitigate the budget exposure a little.
 3. I spoke with Jerry Jones last night at the Enshrinement Ceremony. He brought up the seating unprompted and said "I am a proponent of maximizing the standing room tickets in our suites." I did tell him we were not comfortable with overcrowding at a nearly 1 to 1 ratio. He said that he didn't have the details of what was being proposed, and I told him we were probably going to be somewhere between their normal regular season SRO capacity (based on 50% of the ticketed seats in the suites) and the full 1-SRO for every 1 seat. I told him we had a plan that would mitigate the financial exposure at the expense and he seemed to be at least open to that. I am sure he wants the most people possible for a high attendance figure as much as he wants to make sure he hits our 93,211 number. Just for you to know the conversation happened.
- Good luck! I'll be checking email when I get home around 2 pm if all goes well with the flight.
Regards,
Frank

Ex. 50 (admitted). When questioned regarding this email, Mr. Supovitz concluded to the jury that Mr. Jones was pushing for the highest possible attendance figure, without any apparent regard to the quality of the seating:

Q My question is a little different. My question is, in August of 2010, did you come to the conclusion that Mr. Jones wanted the most people possible for a high attendance figure at the Super Bowl, just as much as he wanted to make sure that he hit the 93,211 number?

A I -- I would characterize that as me being in agreement, yeah.

Q I'm sorry?

A I believe that's right.

3/3/2015 Trial Testimony of Frank Supovitz at 222.

Mr. Supovitz's testimony is confirmed by additional contemporaneous emails. For instance:

From: McConnell, Bill </O=NFLNET/OU=NFL/CN=RECIPIENTS/CN=MCCONNELLB>
Sent: Monday, November 22, 2010 8:33 PM
To: Supovitz, Frank <Frank.Supovitz@NFL.com>; Anderson, Jerry
<Jerry.Anderson@populous.com>
Subject: Re: So Here's Where I Am

Before today, what were we projecting, 4,500 per plaza? Now we're 10,500 on the East only? That seems like a big number. But as JJ said, let's push what we want to do and deal with pushback when it comes.

----- Original Message -----

From: Supovitz, Frank
Sent: Monday, November 22, 2010 09:27 PM
To: Anderson, Jerry; McConnell, Bill
Subject: So Here's Where I Am

88,900 tickets
9,000 credentials
500 stairwell SROs
10,500 East Plaza pass

That's the magic number of 108,900.

Do you think that'll work?

Ex. 73 (admitted).

Accordingly, Mr. Jones' testimony is highly relevant, at a minimum, to the issue of the NFL's motive and intent. *Moreover, his attendance at a trial in a city in which he lives and owns a prized sports franchise, can hardly be described as onerous.*

As the case has unfolded before the jury, the NFL has also argued and elicited testimony that it relied on the Cowboys and Messrs. Jerry and Stephen Jones to ensure that the temporary seats, including the obstructed view seats, were properly installed in a timely fashion and that Messrs. Jerry and Stephen Jones were intimately involved in the process. The NFL claims that Mr. Jerry Jones and Mr. Stephen Jones repeatedly provided assurances to them to this effect, and these assurances are the reason why the NFL did not do more and/or alert the fans beforehand that they should expect problems with their seats. The NFL's primary witness, "Mr. Super Bowl" Frank Supovitz (the Super Bowl's de facto general manager), has testified that Jerry Jones was personally assuring him and the NFL on the days leading up to the game that the seats would be *properly* installed in time for kick-off and, therefore, he failed to alert the fans of any problems:

Q But you were confident that the seats were going to be installed by him on time, which is why you didn't bother to tell the fans, right?

A I was assured by multiple parties involved with installing the seats that they would be ready in time.

Q And your testimony before the jury is that you believed Mr. Suprina as of January of 2011, right?

A Yes, sir.

Q That you found him to be trustworthy despite what your colleagues had been saying about him, right?

A No, sir. I had multiple assurances by the Cowboys and the stadium and Seating Solutions.

Q And you found Mr. Suprina's assurances to be – you believed in those assurances in January of 2011, despite what you had been told, right?

A The collective assurances, yes. I wouldn't have trusted Mr. Suprina individually, no.

Q So you also relied on what the Cowboys told you.

A Yes, sir.

Q Including Jerry Jones, right?

A Yes, sir.

Q And but for the assurances, for instance, of Mr. Jones, you would have done something differently, right?

A I'm not sure I understand.

Q Well, you said that you relied on the assurances of basically three parties.

A Yes, sir.

Q The Cowboys, which includes Mr. Jones specifically, correct?

A Yes.

3/4/15 Trial Testimony of Frank Supovitz at 20-21.

....

E-Mails likewise demonstrate these facts:

From: [Estis, Chad](#)
To: [Jones, Stephen](#)
Subject: RE: RE:
Date: Wednesday, February 02, 2011 9:57:00 PM

Or you mean overall everything is behind?

Chad Estis
Sr. VP of Sales and Booking
Cowboys Stadium
One Legends Way
Arlington, TX 76011
817.892.4401 (o)
817.892.4478 (f)
cestis@dallascowboys.net

-----Original Message-----

From: Jones, Stephen
Sent: Wednesday, February 02, 2011 9:58 PM
To: Estis, Chad
Subject: Re: RE:

Way behind

On Feb 2, 2011, at 9:55 PM, "Estis, Chad" <CEstis@DallasCowboys.net> wrote:

> What do you mean? Is there a problem?

>

> Chad Estis
> Sr. VP of Sales and Booking
> Cowboys Stadium
> One Legends Way
> Arlington, TX 76011
> 817.892.4401 (o)
> 817.892.4478 (f)
> cestis@dallascowboys.net

>

>

> -----Original Message-----

> From: Jones, Stephen
> Sent: Wednesday, February 02, 2011 9:34 PM
> To: Hickman, Mark; Estis, Chad
> Subject:
>
> What's up seat installation?

Ex. 281 (not yet admitted)

From: Supovitz, Frank
Sent: Thursday, February 03, 2011 01:32 PM
To: Anderson, Jerry; McConnell, Bill
Subject:

Price of poker just went up. I spoke to Jerry Jones about both the seating and janitorial issue; particularly about the former because of the possibility of this going public. He was with the Mayor, but is also going to kick some ass at the stadium.

Ex. 284 (admitted).

In fact, counsel for the NFL questioned Mr. Supovitz concerning this email revealing additional compelling reason for Mr. Jones to testify:

Q When did you contact -- is this Mr. Jerry Jones?

A Yes, sir.

Q At what point did you contact Mr. Jerry Jones?

A I don't remember the first time I called him on this. I do remember contacting him by meeting him at the -- at the NFL's commissioner's party on Friday evening. I had been at the stadium. I departed the stadium to make sure I could get him before he left that reception so that I could have that personal conversation with him. That would have been Friday evening between 11 p.m. and midnight.

Q Mr. Supovitz, let me refer you back to 284, Plaintiffs' Exhibit 284, which Mr. Avenatti spoke to you about this morning. Would you blow up the lower part of that email, the first one in time. Mr. Avenatti talked to you about the subsequent emails and about tightening up and the pucker factor and all of that. Do you remember that?

A Yes, sir, I do.

Q And that all came after you notified Mr. McConnell Thursday at 1:32, "Price of poker just went up." Correct?

A Yes, sir.

Q And then you say, "I spoke to Jerry Jones about both the seating and the janitorial issue, particularly about the former, because the possibility of this going public. He was with the mayor, but is also going to kick some ass at the stadium." Did I read that correctly?

A Yes, sir.

Q Now, I'm sorry to be using those words in a courtroom, but I'm sure you didn't intend that to happen.

A Didn't intend --

Q What did you mean by that phrase?

A Which phrase, sir?

Q The kick some –

A Oh, I'm sorry, and I'm sorry if it offends anybody. It was to get down there and apply whatever pressure, whatever power Mr. Jones had at the stadium with his own employees and his contractors to get the work done.

Q And by "work done," which work are you talking about?

A The work of the temporary seats in particular in this case; we were also talking about janitorial issues.

...

Q (By Mr. Behrens) So Mr. Supovitz, between Wednesday and Thursday, you spoke with Brett Daniels, Charlotte Anderson, and Jerry Jones about the issue of the pace of the temporary seat installation. Is that right?

A Yes, sir.

3/4/2015 Trial Testimony of Frank Supovitz 88-90.

Without Mr. Jones' testimony, the Plaintiffs are placed in the untenable position of trying to prove what Mr. Jones' told the NFL, and whether the NFL reliance on his assurance was reasonable, without Mr. Jones – a witness who is both local and available.³ *Moreover, Plaintiffs must be permitted to test the veracity of the statements made by Mr. Supovitz and Mr. Goodell under oath before the jury as they relate to their communications with Messrs. Jerry Jones and*

³ The Court should reject Mr. Jones' argument that the subpoena did not provide him with adequate time to personally appear at trial. Rule 45, by its explicit text, does not specify how many days' notice must be given for a subpoena; it merely requires "reasonable time" to comply. Here, the very documents submitted in support of Mr. Jones' Motion demonstrate he had "reasonable time" to comply. In particular, his counsel had notice, no later than February 19, 2015 (nearly two weeks before trial), that Plaintiffs intended to call Mr. Jones as a witness. See Dkt. No. 407, Exh. E at Tab 1. Moreover, Mr. Jones counsel has remained abreast of developments in this case, including Plaintiffs' witness list, by virtue of being included on the ECF distribution. Lest there be any doubt, Mr. Jones signed a lengthy declaration in support of his Motion to Quash the *very same day* (February 27, 2015) he was served with the subpoena. See Dkt. No. 407, Exh. F. That declaration was obviously prepared in advance of Mr. Jones being served, as Mr. Jones knew full well the subpoena was coming and expected he would be called to testify. Thus the notion that Mr. Jones learned at the last second of the need for him to appear at trial is incorrect.

Further, given that Mr. Jones has known of the need for his appearance since at least February 19, 2015, his contention that he will be out-of-state on business and cannot appear is unsupported and should be rejected. Mr. Jones could have, but for whatever reason chose not to, ensure that he would be in the Dallas area and available to testify.

Stephen Jones. Plaintiffs nor the jury must merely accept the statements made by Mr. Supovitz and Mr. Goodell as true without the opportunity for impeachment through two live witnesses.

B. The Prior Decision By Magistrate Tolliver in Greco Has No Bearing on The Motions At Issue

Plaintiffs respectfully note the following relating to the inapplicability of the prior decision by Magistrate Tolliver in the Greco lawsuit to the present motions filed by Messrs. Jones and Jones:

1. The decision was rendered without the benefit of many of the documents admitted in this trial and most certainly without the benefit of the critical testimony elicited over the last two and a half days relating to the involvement of Jerry and Stephen Jones in the events at issue.
2. The decision was rendered without the benefit of the NFL's arguments in opening statements in this trial (see above).
3. The decision is presently on appeal, with the appeal being filed on February 23, 2015 [Docket No. 158].
4. The decision has no collateral estoppel effect on this case.

C. The Apex Witness Doctrine Does Not Save Messrs. Jones and Jones From Having to Testify

On March 4, this Court noted the following relating to Messrs. Jones and Jones and their arguments relating to the Apex Doctrine:

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I want the parties to confer about what is in dispute here. It is extremely unlikely that I will allow -- if I rule on the matter, I will allow the subpoenas to be used to obtain documents. I don't know on what basis I would permit that, given that there have been discovery disputes about documents that the magistrate judge has resolved. With respect to Jerry Jones, the objection -- the

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Apex objection, if I rule on the matter, is not likely to carry much weight with me, because the testimony is such that Mr. Jones potentially has evidence to give here that is not prohibited by the Apex rule.

Stephen Jones is a closer question. And whether there needs to be any further witnesses representative of the Cowboys, I'm skeptical.

So I've given you-all sort of my temperature on it.

I'm not at this moment withdrawing the referral, but I want you-all to confer in light of my preliminary take on the matter.

MR. AYERS: May I approach the podium, Your Honor?

THE COURT: Yes.

MR. AYERS: Last evening I spoke with counsel for the Cowboys, Mr. Grinke and Mr. McCathern and sent a follow-up. We have withdrawn our document request from them, and they've agreed no further subpoena needs to be submitted to them. So we understand the issue, Your Honor, and we're not going to request any documents from any of the Cowboys witnesses.

THE COURT: Well, I want you to pass on to them -- they have the right to be heard, and they're not here -- what my reaction is, and obviously you'll consult as well with the NFL, but I want to know if there's going to be an agreement or not.

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MR. AYERS: Yes, ma'am.

THE COURT: If there's a dispute, I'm still going to refer the matter to the magistrate judge.

MR. GOLD: Just for clarification, there were also, I understand, subpoenas for documents issued to a number of entities associated with the Cowboys. Are those being pursued?

MR. AYERS: We've withdrawn all document requests.

THE COURT: That's the way I understood it.

So what I'm suggesting is, I would like the parties and the nonparties, representing the Cowboy entities and Messrs. Jones, to confer about whether there is some agreement about Jerry Jones, for example, coming without the necessity of bringing documents.

I haven't heard much that convinces me that Stephen Jones should be required to appear. But if you are earnest in that, you may make that argument to the magistrate judge.

MR. AYERS: We will do that.

THE COURT: The document issue, then, has gone

away, and I'm going to notify the magistrate judge of that.
MR. AYERS: We will do that this afternoon,
Your Honor, and I'll update the law clerk, as well as Judge
Toliver's law clerk.

In light of these statements by the Court, Plaintiffs will only briefly address the Apex issue.

The ability to ask Messrs. Jones and Jones about the issues in this case is critical because as demonstrated thus far in the trial, they both possess *unique, personal* knowledge and the jury is entitled to judge their credibility and compare it to the testimony of other witnesses. *See, e.g., Kimberly-Clark Corp.*, 2006 WL 3436064, at *2 (“[f]ederal courts have permitted the depositions of high level executives when conduct and knowledge at the highest corporate levels of the defendant are relevant in the case.”) (quoting *In re Bridgestone/Firestone, Inc., Tires Products Liability Litigation*, 205 F.R.D. 535, 536 (S.D. Ind. 2002)); *Six West Retail Acquisition, Inc. v. Sony Theatre Mgmt. Corp.*, 203 F.R.D. 98, 102 (S.D.N.Y. 2001) (highly-placed executives are not “immune from discovery[.]”); *In re Mentor Corp. Obtape Transobturator Sling Products Liability Litigation*, No. 4:08-MD-2004(CDL), 2009 WL 4730321, at *1 (M.D. Ga. Dec. 1, 2009) (“where the executive has personal knowledge of and involvement in certain relevant matters or where conduct and knowledge of the highest corporate levels are relevant in the case, a deposition of the executive is generally permitted.”).

Further, none of the above is changed by the efforts of Messrs. Jones and Jones to distance themselves from the events at issue. *Travelers Rental Co., Inc. v. Ford Motor Co.*, 116 F.R.D. 140, 143 (D. Mass. 1987) (even where a party claims that its executives “know nothing” or “remember nothing” about the facts relevant to a controversy, “[t]he plaintiff is entitled to ‘test’ the claim of lack of knowledge or lack of recollection by deposing the witness.”); *Six West Retail*, 203 F.R.D. at 102 (even where “a high-ranking corporate officer denies personal knowledge of the issues at hand, this claim . . . is subject to testing by the examining party.”).

II. CONCLUSION

For the foregoing reasons, Plaintiffs respectfully requests that the Court deny the motions to quash and for protective order.

Dated: March 5, 2015

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R. Jack Ayres, Jr.
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this filed pleading is being served upon all counsel of record through the Court's ECF delivery system, as provided by the Local Rules at or shortly after the time and date of filing.

DATED: March 5, 2015

s/ Christopher S. Ayres

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EXHIBIT 1

From: Supovitz, Frank </O=NFLNET/OU=NFL/CN=RECIPIENTS/CN=SPECIAL
EVENTS/CN=USERS/CN=FRANK.SUPOVITZ>
Sent: Sunday, August 8, 2010 4:00 PM
To: McConnell, Bill
 </O=NFLNET/OU=NFL/CN=RECIPIENTS/CN=MCCONNELLB>; Otto, Fred
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Subject: RE: Temporary Seating plan

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1. We had pinchpoints in Arizona's endzone, too. If it's still manageable, then we'll accept, keeping safety and comfort as our guiding principles, in that order. We're charging a lot for tickets, and making the stadium an uncomfortable space serves no one's purposes. I know I did not need to say this, but I guess I did anyway.
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3. I spoke with Jerry Jones last night at the Enshrinement Ceremony. He brought up the seating unprompted and said "I am a proponent of maximizing the standing room tickets in our suites." I did tell him we were not comfortable with overcrowding at a nearly 1 to 1 ratio. He said that he didn't have the details of what was being proposed, and I told him we were probably going to be somewhere between their normal regular season SRO capacity (based on 50% of the ticketed seats in the suites) and the full 1-SRO for every 1 seat. I told him we had a plan that would mitigate the financial exposure at the expense and he seemed to be at least open to that. I am sure he wants the most people possible for a high attendance figure as much as he wants to make sure he hits our 93,211 number. Just for you to know the conversation happened.

Good luck! I'll be checking email when I get home around 2 pm if all goes well with the flight.

Regards,
 Frank

From: McConnell, Bill
Sent: Fri 8/6/2010 3:28 PM
To: Hill, Jack; Daniels, Brett
Cc: Supovitz, Frank; 'Todd Barnes'; Jerry Anderson; Otto, Fred
Subject: Temporary Seating plan

Jack, Brett-

In advance of our discussion Monday, we asked Populous to review the proposed temporary seating plan and highlight any issues, challenges or questions we should collectively consider in trying to determine the number of available, saleable seats.

The attached level plans include some comments, questions and observations which may help our discussion.

While we also plan to review some of the other points raised in previous discussions and correspondence, one of the main themes will be to gain confidence that all seats will have a high level of comfort, service and access to concessions, merchandise and restrooms.

We look forward to speaking with you on Monday.

Bill

Bill McConnell



Confidential

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NFL-015531

From: Grubman, Eric </O=NFLNET/OU=NFL/CN=RECIPIENTS/CN=ERIC.GRUBMAN>
Sent: Thursday, November 11, 2010 7:22 PM
To: Supovitz, Frank </O=NFLNET/OU=NFL/CN=RECIPIENTS/CN=SPECIAL
EVENTS/CN=USERS/CN=FRANK.SUPOVITZ>
Subject: RE: SRO Follow Up

Jerry needs some good news. well done

-----Original Message-----

From: Supovitz, Frank
Sent: Thu 11/11/2010 7:07 PM
To: Grubman, Eric
Subject: SRO Follow Up

I presented a plan to Jerry Jones today that takes most of the SRO pressure off the clubs and maintains much of the exclusivity for those who paid top dollar. He embraced the plan enthusiastically and we made a few tweaks together that will help him beat the record - beyond what he proposed during our call with the Commissioner. I am also confident it will pass muster with the public safety agencies.

I am going to review that plan with our security and operations groups on Tuesday, and unless I miss my guess, we'll have something solid that I can share with you when I return at the end of next week.

Sup



NFL-016402

From: Supovitz, Frank </O=NFLNET/OU=NFL/CN=RECIPIENTS/CN=SPECIAL EVENTS/CN=USERS/CN=FRANK.SUPOVITZ>
Sent: Sunday, February 6, 2011 4:45 PM
To: Aiello, Greg <Greg.Aiello@NFL.com>
Cc: Grubman, Eric <Eric.Grubman@NFL.com>; Hicks, Paul <Paul.Hicks@NFL.com>; Signora, Michael <Michael.Signora@NFL.com>; McCarthy, Brian <Brian.McCarthy@NFL.com>; Abitante, Peter <Pete.Abitante@nfl.com>
Subject: Re: Attendance Email of other day

My numbers are
Stadium manifest 87,740
Plaza Party. 3,000
Platform Standing Room. 320
Total manifest. 91,060

Credentials. 12,159

XLV Total 103,219

Record (XIV). 103,985

I leave it to you - my druthers would be the 91,060. But, I defer to those copied to agree.

On Feb 6, 2011, at 5:13 PM, "Aiello, Greg" <Greg.Aiello@NFL.com> wrote:

> Precisely!! Does anyone get it yet?
>
> ----- Original Message -----
> From: Grubman, Eric
> Sent: Sunday, February 06, 2011 05:12 PM
> To: Supovitz, Frank; Aiello, Greg
> Cc: Hicks, Paul; Signora, Michael; McCarthy, Brian; Abitante, Peter
> Subject: Re: Attendance Email of other day
>
> Precisely. And Jerry is in agreement
>
> ----- Original Message -----
> From: Supovitz, Frank
> Sent: Sunday, February 06, 2011 05:13 PM
> To: Aiello, Greg
> Cc: Hicks, Paul; Grubman, Eric; Signora, Michael; McCarthy, Brian; Abitante, Peter
> Subject: Re: Attendance Email of other day
>
> With all due respect, and one battered man's opinion, do we really want to be announcing a record at this debacle? If you are using my original number, deduct the 1,260 seats that were killed today.

> Personally, I think it'll look like we put fans through hell to do that.
> You can also deduct 200 from the Party Plaza.



NFL-013750

>
>
>
>
> On Feb 6, 2011, at 5:01 PM, "Aiello, Greg" <Greg.Aiello@NFL.com> wrote:
>
>> Frank has to update numbers.
>>
>> ----- Original Message -----
>> From: Aiello, Greg
>> Sent: Sunday, February 06, 2011 04:58 PM
>> To: Hicks, Paul; Grubman, Eric; Supovitz, Frank; Signora, Michael; McCarthy, Brian; Abitante, Peter
>> Subject: Attendance Email of other day
>>
>>
>> Unless we hear otherwise, our plan is to go with this announcement in the third quarter:
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>> Today's Attendance:
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>> Tickets Sold -- 92,520 (including 3,200 for Party Plaza)
>>
>>
>>
>> Credentialed Attendees -- 12,159
>>
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>>
>> Total Attendance at Stadium -- 104,679
>>
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>>
>> This is a record for attendees at a Super Bowl game.
>>
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>>
>> Previous Super Bowl attendance record -- 103,985 (included credentialed attendees) (1/20/80, Rose Bowl, Pittsburgh-LA Rams)
>>
>>
>>

From: Supovitz, Frank </O=NFLNET/OU=NFL/CN=RECIPIENTS/CN=SPECIAL
EVENTS/CN=USERS/CN=FRANK.SUPOVITZ>
Sent: Sunday, February 6, 2011 4:22 PM
To: Aiello, Greg <Greg.Aiello@NFL.com>
Cc: Grubman, Eric <Eric.Grubman@NFL.com>; Hicks, Paul <Paul.Hicks@NFL.com>;
Signora, Michael <Michael.Signora@NFL.com>; McCarthy, Brian
<Brian.McCarthy@NFL.com>; Abitante, Peter <Pete.Abitante@nfl.com>
Subject: Re: Attendance Email of other day

I do. I'll send entirely new numbers when my ass stops getting kicked.

On Feb 6, 2011, at 5:13 PM, "Aiello, Greg" <Greg.Aiello@NFL.com> wrote:

> Precisely!! Does anyone get it yet?

>

> ----- Original Message -----

> From: Grubman, Eric

> Sent: Sunday, February 06, 2011 05:12 PM

> To: Supovitz, Frank; Aiello, Greg

> Cc: Hicks, Paul; Signora, Michael; McCarthy, Brian; Abitante, Peter

> Subject: Re: Attendance Email of other day

>

> Precisely. And Jerry is in agreement

>

> ----- Original Message -----

> From: Supovitz, Frank

> Sent: Sunday, February 06, 2011 05:13 PM

> To: Aiello, Greg

> Cc: Hicks, Paul; Grubman, Eric; Signora, Michael; McCarthy, Brian; Abitante, Peter

> Subject: Re: Attendance Email of other day

>

> With all due respect, and one battered man's opinion, do we really want to be announcing a record at this debacle? If you are using my original number, deduct the 1,260 seats that were killed today.

> Personally, I think it'll look like we put fans through hell to do that.

> You can also deduct 200 from the Party Plaza.

>

>

>

>

> On Feb 6, 2011, at 5:01 PM, "Aiello, Greg" <Greg.Aiello@NFL.com> wrote:

>

>> Frank has to update numbers.

>>

>> ----- Original Message -----

>> From: Aiello, Greg

>> Sent: Sunday, February 06, 2011 04:58 PM

>> To: Hicks, Paul; Grubman, Eric; Supovitz, Frank; Signora, Michael; McCarthy, Brian; Abitante, Peter

>> Subject: Attendance Email of other day

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NFL-015760

>> Unless we hear otherwise, our plan is to go with this announcement in the third quarter:

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>> Today's Attendance:

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>> Tickets Sold -- 92,520 (including 3,200 for Party Plaza)

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>> Credentialed Attendees -- 12,159

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>> Total Attendance at Stadium -- 104,679

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>> This is a record for attendees at a Super Bowl game.

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>> Previous Super Bowl attendance record -- 103,985 (included credentialed attendees) (1/20/80, Rose Bowl, Pittsburgh-LA Rams)

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>>

From: Otto, Fred </O=NFLNET/OU=NFL/CN=RECIPIENTS/CN=OTTOF>
Sent: Monday, September 27, 2010 7:13 PM
To: Supovitz, Frank <Frank.Supovitz@NFL.com>
Subject: RE: Silver Level

Well- they only get 3,000 tix- doubt if Jerry would be very happy if 1,000 of them were obstructed

From: Supovitz, Frank
Sent: Monday, September 27, 2010 8:11 PM
To: Otto, Fred
Subject: Re: Silver Level

How many can we put them in the Cowboys allocation if they are "ok" in their opinion?

From: Otto, Fred
Sent: Monday, September 27, 2010 08:06 PM
To: Supovitz, Frank
Subject: FW: Silver Level

Let's see what Todd comes back with- this is horrible- affects everything- including the numbers I gave Wintergrass today

From: Otto, Fred
Sent: Monday, September 27, 2010 8:05 PM
To: 'Todd Barnes'
Subject: RE: Silver Level

Scott said "I would never install a seat I would not sit in myself"- not forthright at all- ask Jack Hill- and we need to know NOW- already have done a lot of seat allocations and this would be a horrible back step!

From: Todd Barnes [mailto:Todd.Barnes@populous.com]
Sent: Monday, September 27, 2010 8:03 PM
To: Otto, Fred
Subject: RE: Silver Level

There are no options unless you don't sell the seats as far as I can tell. We should have Jack Hill give us an evaluation for how many seats are affected. I don't recall the Cowboys or Seating Solutions being forthright about this. Do you?

I would say that it is approx. 800 to 1,000 between the east and west ends. Perhaps 100 per seating section is a rough estimate.

From: Otto, Fred [mailto:Fred.Otto@NFL.com]
Sent: Monday, September 27, 2010 4:54 PM
To: Todd Barnes
Subject: RE: Silver Level

How many seats would you guess this would affect? What are our options??

From: Todd Barnes [mailto:Todd.Barnes@populous.com]
Sent: Monday, September 27, 2010 7:43 PM
To: Otto, Fred
Subject: Silver Level



NFL-011888

Fred,

The Silver Level has many sight line issues.

There are 2 sets of columns and the forward most column will cause the most problem. Quite a large sight line shadow.

The column is about 24 inches wide, where the stripper poles are located, so sight lines will be obstructed depending on where the play is....

See attached plan and photo. I only marked one seating section on the attached plan, but all will have problems.

Thanks,
Todd

The information contained in this electronic communication, as well as in any attachments, may contain confidential or privileged information and may constitute non-public information, and is intended solely for use by the addressee(s). Any other use, disclosure, dissemination, distribution or copying of this electronic communication is strictly prohibited, may constitute an interference with Populous confidential business relationships and may be unlawful. If you received this communication in error, please notify me immediately and permanently delete the original and any electronic or printed copies of this electronic communication (including any attachments). Populous makes no representation regarding the absence of any virus in any attachment and expressly disclaims any responsibility for any damage suffered from the presence of a virus.

From: McConnell, Bill </O=NFLNET/OU=NFL/CN=RECIPIENTS/CN=MCCONNELLB>
Sent: Monday, November 22, 2010 8:33 PM
To: Supovitz, Frank <Frank.Supovitz@NFL.com>; Anderson, Jerry
<Jerry.Anderson@populous.com>
Subject: Re: So Here's Where I Am

Before today, what were we projecting, 4,500 per plaza? Now we're 10,500 on the East only? That seems like a big number. But as JJ said, let's push what we want to do and deal with pushback when it comes.

----- Original Message -----

From: Supovitz, Frank
Sent: Monday, November 22, 2010 09:27 PM
To: Anderson, Jerry; McConnell, Bill
Subject: So Here's Where I Am

88,900 tickets
9,000 credentials
500 stairwell SROs
10,500 East Plaza pass

That's the magic number of 108,900.

Do you think that'll work?



NFL-012092

From: Supovitz, Frank </O=NFLNET/OU=NFL/CN=RECIPIENTS/CN=SPECIAL
EVENTS/CN=USERS/CN=FRANK.SUPOVITZ>
Sent: Tuesday, February 1, 2011 5:45 PM
To: McConnell, Bill <Bill.McConnell@NFL.com>
Subject: FW: JJ on attendance

Isn't this nice?

From: Aiello, Greg
Sent: Tuesday, February 01, 2011 6:43 PM
To: Supovitz, Frank
Subject: RE: JJ on attendance

Frank: Milt was telling me that we are going to receive numerous complaints about some of the seats we sold. I know this has been an issue. Is commish aware?

From: McCarthy, Brian
Sent: Tuesday, February 01, 2011 6:40 PM
To: Supovitz, Frank; McConnell, Bill
Cc: Aiello, Greg
Subject: JJ on attendance

Jerry did a press conf at the media center today.

USA today

Jerry Jones: Fans inside Cowboys Stadium will break Super Bowl attendance record

By Sean Leahy, USA TODAY
Comment

Recommend

DALLAS -- Super Bowl XLV will set a new record for largest attendance at a Super Bowl, Dallas Cowboys owner **Jerry Jones** said Tuesday.

And Jones doesn't intend for the record to have an asterisk.

Jones, who is hosting the game at Cowboys Stadium, said he thinks the number of attendants inside the park for Sunday's game will surpass the previous record of 103,985 at Super Bowl XIV.

The NFL had previously said it expected to break the attendance mark, with the ticket holders to the party plaza -- those outside the stadium but inside the Cowboys Stadium complex who will watch on TV screens -- counted inside the attendance figure.

"I do think we'll have the most people to have ever been at the stadium," said Jones, who later added that would only cover a record for an NFL game.

Cowboys Stadium drew 108,173 people for the NBA All-Star game last year. In the Cowboys' opening game against the New York Giants in 2009, the attendance was 105,121, a record for NFL regular-season games.

Jones said his two-year-old stadium is certified to hold 111,000 people, and he's confident the stadium can hold all those people logistically and safely.

He noted that the local fire marshal has objected to his estimate in the past, however, but said he has worked through issues with the fire marshal.

See photos of: NFL, Dallas Cowboys, Jerry Jones, Cowboys Stadium



NFL-028555

From: Supovitz, Frank <frank.supovitz@nflnet.com>
Sent: Friday, February 4, 2011 8:11 PM
To: Grubman, Eric <Eric.Grubman@NFL.com>
Subject: Re: Stadium Updates

Please alert him that we remain as concerned as yesterday, maybe moreso.

----- Original Message -----

From: Grubman, Eric
Sent: Friday, February 04, 2011 09:04 PM
To: Supovitz, Frank
Subject: Re: Stadium Updates

Some times the calling of a "summit meeting" gets things done. Sometimes it is a waste of time. If I see Jerry I will mention the concept

----- Original Message -----

From: Supovitz, Frank
Sent: Friday, February 04, 2011 09:00 PM
To: Grubman, Eric
Subject: Re: Stadium Updates

I would not turn down ANY help that can get this finished and finished right. I've called Jerry a few times on this the last few days and it helped kick ass. But it's still not done.

I will seek you out when I get back. I'm with OSHA right now.

----- Original Message -----

From: Grubman, Eric
Sent: Friday, February 04, 2011 08:48 PM
To: Supovitz, Frank
Subject: Re: Stadium Updates

Should we meet there in the morning with Jerry and his team and some experts?

----- Original Message -----

From: Supovitz, Frank
Sent: Friday, February 04, 2011 08:43 PM
To: Grubman, Eric
Subject: Re: Stadium Updates

Exactly right. They are working all night and all day tomorrow.

----- Original Message -----

From: Grubman, Eric
Sent: Friday, February 04, 2011 08:37 PM
To: Supovitz, Frank
Subject: Re: Stadium Updates

Am very concerned on seats. The revenue is nonexistent on my list as an issue of concern now. That will be sorted out later. We have to focus on getting the seats that are appropriate done, checked and certified and then produce the game.

----- Original Message -----



From: Supovitz, Frank
Sent: Friday, February 04, 2011 07:49 PM
To: Grubman, Eric; Abitante, Peter
Subject: Stadium Updates

Snow is coming off the roof. As expected, it's smashed the tent structures underneath. Hoping to get the all clear by 10pm, or at first light if impossible to tell at night. Will be safe for tomorrow.

The temporary seat issue is coming to a head. The City of Arlington has been completely flexible and cooperative in extending inspection deadlines to even after tonight's security sweep. Simply, the seating is still not certified. It's mostly in and most are structurally ok, but none have been cleared and there's still a lot of work to do on rails, steps, gaps, etc. Arlington is concerned that some may simply not be ready (though they are pushing the stadium and contractor as hard as we are). I have asked Fred to suspend all further sales of tickets until we have an idea of whether all the temps will be cleared or a few hundred are not. This way, we have some more "relocate seats". Everyone, including the Cowboys and Arlington, understand that we must accommodate everyone who now has a ticket somewhere if their seat is not available. The exposure is great if we fail. Safety first, of course. The issue here, to be fought with the Cowboys at some point, is we may not make revenue on the seats that I've asked Fred to hold.

Will try to get to the FNP to allow you to get as much detail as you need from me directly.

From: Supovitz, Frank </O=NFLNET/OU=NFL/CN=RECIPIENTS/CN=SPECIAL
EVENTS/CN=USERS/CN=FRANK.SUPOVITZ>
Sent: Wednesday, February 2, 2011 9:46 PM
To: McConnell, Bill <Bill.McConnell@NFL.com>; Anderson, Jerry
<Jerry.Anderson@populous.com>; Otto, Fred <Fred.Otto@NFL.com>
Subject: Seating Update

I could not reach Jerry Jones this evening, but I did reach Charlotte Anderson and expressed our concerns on the continually slipping seating installation schedule and a seeming lack of urgency. Charlotte was at the stadium and agreed that it did not appear that work would be complete by tomorrow night. I shared many of the details we've discussed over the past 48 hours. She was going to rouse Jack Hill and the contractor and took ownership of the situation from the Family's side. I will hear from her again in the morning on "the plan."

F.

PLAINTIFF'S
EXHIBIT

280

NFL-017447

From: Aiello, Greg </O=NFLNET/OU=NFL/CN=RECIPIENTS/CN=AIELLOG>
Sent: Thursday, February 3, 2011 4:32 PM
To: Goodell, Roger [REDACTED] Redacted
Cc: Supovitz, Frank <Frank.Supovitz@NFL.com>; Grubman, Eric
<Eric.Grubman@NFL.com>
Subject: FW: Attendance

Please review and let me know if you approve. Next step after that: I will inform Jerry Jones.

Joe Browne: I believe the Rose Bowl included credentialed media but not the every press box runner who had a credential or phone worker who had a credential. I thk in those days before rose bowl remodeling that the mostly bleacher seating capacity was larger than the approx 90k seats here in dallas.

Joel Bussert: Don't know what the 1980 figure includes.

Based on that, I would go with:

Today's Attendance:

Tickets Sold -- 92,520 (including 3,200 for Party Plaza)

Credentialed -- 12,159

Total Attendance at Stadium -- 104,679

This is a record for attendees at a Super Bowl game.

Previous Super Bowl attendance record -- 103,985 (included credentialed attendees) (1/20/80, Rose Bowl, Pittsburgh-LA Rams)

-----Original Message-----

From: Aiello, Greg
Sent: Thursday, February 03, 2011 2:48 PM
To: Abitante, Peter
Subject: RE: Attendance

Today's Attendance:

Tickets Sold -- 92,520 (including 3,200 for Party Plaza)

Credentialed -- 12,159

Total Attendance at Stadium -- 104,679

Previous Super Bowl Record -- 103,985 (1/20/80, Rose Bowl, Pittsburgh-LA Rams)



NFL-016396

(Did the previous record include credentialed people? Ask Don Weiss.)

-----Original Message-----

From: Abitante, Peter

Sent: Thursday, February 03, 2011 1:47 PM

To: Aiello, Greg

Subject: Attendance

RG and JJ spoke after YET PR. RG asked that you draft the announcement. RG thinking is something along the lines of:

104 attended

92 ticketed

12k credentialed for a total attendance of 104.

RG should be free from 2:30 to 4:30. Heading back now -- will stop by to discuss.

From: Supovitz, Frank <frank.supovitz@nflnet.com>
Sent: Thursday, February 3, 2011 6:48 PM
To: McConnell, Bill <Bill.McConnell@NFL.com>
Subject: RE:

He should be tightening up A LOT!

From: McConnell, Bill
Sent: Thursday, February 03, 2011 1:36 PM
To: Supovitz, Frank
Subject: Re:

I was on the phone with Jack when charlotte called him. He's tightening up a bit.

From: Supovitz, Frank
Sent: Thursday, February 03, 2011 01:32 PM
To: Anderson, Jerry; McConnell, Bill
Subject:

Price of poker just went up. I spoke to Jerry Jones about both the seating and janitorial issue; particularly about the former because of the possibility of this going public. He was with the Mayor, but is also going to kick some ass at the stadium.

PLAINTIFF'S
EXHIBIT

284

NFL-033147

From: Supovitz, Frank </O=NFLNET/OU=NFL/CN=RECIPIENTS/CN=SPECIAL
EVENTS/CN=USERS/CN=FRANK.SUPOVITZ>
Sent: Sunday, February 6, 2011 3:19 PM
To: Abitante, Peter <Pete.Abitante@nfl.com>
Subject: Re: Stadium Update

Yes. But not all 2000 are in there. It's rough out there. I don't think it's wise for RG to go out there. How ETA is 345 p on the Pepsi deck.

On Feb 6, 2011, at 4:14 PM, "Abitante, Peter" <Pete.Abitante@nfl.com> wrote:

Is this the 2000 then?

From: Supovitz, Frank
Sent: Sunday, February 06, 2011 04:09 PM
To: Supovitz, Frank
Cc: McConnell, Bill; Mills, Christine; Augenthaler, Mary Pat; Anderson, Jerry; Abitante, Peter; McCarthy, Brian; Signora, Michael; Otto, Fred
Subject: Re: Stadium Update

We are closing access to the Party Plaza at the request of the Arlington PD. We expect to get the Pepsi Plaza people into the stadium at or about 3:30. The deck is being inspected now.

On Feb 6, 2011, at 3:54 PM, "Supovitz, Frank" <Frank.Supovitz@NFL.com> wrote:

The 2000 seats in the Pepsi Deck expected to be available are projected for completion at 4:30.

On Feb 6, 2011, at 3:15 PM, "Supovitz, Frank" <Frank.Supovitz@NFL.com> wrote:

Stadium doors about to open. The Pepsi Deck people will still be in the Party Plaza until we can clarify condition of their seats.

On Feb 6, 2011, at 2:48 PM, "Supovitz, Frank" <Frank.Supovitz@NFL.com> wrote:

We are now advised that the 400 seats on the extreme ends of the 2400 person Pepsi deck will not be usable. The crew is still trying save the remaining 2000. Projected completion in one hr.

Our confirmed unusable tickets are now 1200.

PLAINTIFF'S
EXHIBIT

290

NFL-011980

On Feb 6, 2011, at 2:36 PM, "Supovitz, Frank"
<Frank.Supovitz@NFL.com> wrote:

All 4 quadrants of the stadium are now shut down to hanging ice and expected fall. The Fire Department is managing ingress and egress. Will make entrance slower but safe.

**BRUCE IBE, CONSTANCE YOUNG,
JASON MCLEAR, ROBERT FORTUNE,
DEAN HOFFMAN, KEN LAFFIN, DAVID
WANTA, and REBECCA BURGWIN
vs.
NATIONAL FOOTBALL LEAGUE**



PLAINTIFFS' TRIAL EXHIBIT 370



From: McConnell, Bill </O=NFLNET/OU=NFL/CN=RECIPIENTS/CN=MCCONNELLB>
Sent: Wednesday, May 12, 2010 2:20 PM
To: Supovitz, Frank <Frank.Supovitz@NFL.com>; Otto, Fred <Fred.Otto@NFL.com>; 'Jerry Anderson' <Jerry.Anderson@populous.com>; 'Todd Barnes' <Todd.Barnes@populous.com>
Subject: FW: Seating RFP
Attach: Seating RFP 051210.pdf

Fred and I had the conversation with Jack Hill and Brett Daniels about the seat plan in which Fred and I told Brett and Jack that there is a sense of urgency for us to receive the seating plan. We told them that we are getting pressure on seat allocations/allotments and that we need to move forward with our interior design plans which hinge on the seating plan.

Here's what we found out:

- 1) The initial rfp is attached (not sure what's in it because I haven't reviewed it yet, but I suspect it contains most info we already know). Since it is the most current info, it is probably worth forwarding pending review of the actual submitted bids.
- 2) Two companies submitted bids and according to Jack, the bids vary in content structure including with respect to purchase or rental of seats and pricing.
- 3) Their next step is to present the options to the Jones family and make a final selection. They would prefer to wait until a decision is made before sending the specifics of the bid to us.
- 4) They are still working from their last projections to Fred and Frank for 93,000 seats in total, including a to be confirmed number of standing room in suites.

We should use next Wednesday as the next critical time point on this. That is when we'll be in North Texas to review the Construction Management bids, and if we don't get more detail by then on the temporary seat plan, we might consider escalating the urgency of our request.

Bill McConnell
Director, Event Operations
National Football League
280 Park Ave
New York, NY 10017
212-450-2082
bill.mcconnell@nfl.com

From: Hill, Jack [mailto:JHill@DallasCowboys.net]
Sent: Wednesday, May 12, 2010 1:31 PM
To: McConnell, Bill
Subject: Seating RFP

Bill,
Here is a copy of the RFP, let me know if you have any questions or concerns. Thanks

Jack Hill
Stadium General Manager
Cowboys Stadium, L.P.
1 Legends Way
Arlington, Texas 76011



817 892-4154 offc
214 769-4810 mob
817 548-3397 fax
jhill@dallascowboys.net

**DALLAS COWBOYS STADIUM IN ARLINGTON, TX
NFL FOOTBALL STADIUM**

BID PACKAGE

Temporary Seating System

ISSUE DATE:

PROJECT REQUIREMENTS

TABLE OF CONTENTS

The following is a list of documents that define the requirements of the project. These Documents are included in the Contract Documents.

- 2.01 Cover
- 2.02 Invitation to Bidders
- 2.03 Scope of Work and Instructions to Bidders
- 2.04 Proposal From
- 2.05 Specification
- 2.06 Minimum Insurance Requirements
- 2.05 Scope Drawings

DALLAS COWBOYS STADIUM
ARLINGTON, TEXAS

INVITATION TO BIDDERS

March 30, 2010

BID CATEGORY DESCRIPTION: Temporary Seating System

BID DATE/TIME: April 21, 2010, 2:00 P.M. (Central Time)

BID LOCATION: CSLP, Inc.
(Address and Place of Bid Delivery) 1 Legends Way
Arlington, TX 76011
Main Phone: (817) 892-4141

PRE-BID CONFERENCE:

DATE: TBD
TIME: TBD
PLACE: 1 Legends Way
Arlington, TX 76011

Contact: Jack Hill
jhill@dallascowboys.net

BID PROPOSAL SUBMISSION CHECKLIST

The following items are required to be submitted as part of your bid proposal:

DOCUMENTS REQUIRED	DATE & TIME DUE
_____ Bid Proposal Form	due by bid date & time
_____ Preliminary List of Principal Subcontractors and vendors	due by bid date & time
_____ Proposed Alternates	due by bid date & time
_____ Preliminary Drawings and Seat Counts	due by bid date & time

Please let us know if there are any of the above items that you will need additional time to provide.

Scope of Work and Instructions to Bidders:

1. Proposals will be received by CSLP at their project offices, 1 Legends Way, Arlington, Texas 76011 until 2:00 on April 21, 2010 for the turnkey design, build (including installation and de-installation) of temporary seating in conjunction with the 2011 Super Bowl. Bidders will be contacted to attend a pre-bid conference scheduled to occur in early April.
2. Bidders shall use the proposal forms included in the documents. Proposal forms are to be left attached to documents in the same manner as received by the bidders. Supplemental data to be furnished shall be included in the same sealed envelope with the proposal.
3. It shall be the bidder's responsibility for the delivery of his proposal at the proper place by the time stated in the Notice to Bidders. The mere fact that a proposal was dispatched will not be considered. Each proposal shall be in a sealed envelope plainly marked with the name or description of the project as shown on the front cover of the contract documents.
4. The scope of work for these bid documents covers all labor, materials, supervision and incidentals required to completely furnish, install and de-install the temporary seating system. All costs associated with the requirements under this section are to be included in Bidder's proposal for these services.
5. Bidders acknowledge plans and specifications furnished as part of these bid documents are complimentary in nature and any refinement of these documents required by Bidder to complete a turn-key installation of the system will be furnished as part of this scope and is included in Bidders price. As part of the scope of this project, but not required to be submitted with the bid, it is the intent of the Contract Documents for the Contractor to provide a 1) complete design (sealed by a structural engineer licensed in the State of Texas), 2) code review and 3) complete and working documents for a system which meets industry standards, FM Global Insurance requirements and all Federal, State and local codes, ordinances, laws and guidelines.
6. CSLP reserves the right to accept alternative systems proposed by Bidders. Any alternate system proposed by Bidders shall include all costs associated with such alternate including but not limited to design fees, additional coordination fees and construction costs.
7. Bidder will be required to coordinate its use of the site and all aspects of its work with third party contractors performing work at the Stadium. Staging areas to be coordinated with CSLP.
8. Bidder shall require all of its employees and subcontractor employees performing work on the site to be drug free.
9. Prior to the submission of the proposal, the Bidder shall have made careful examination of the site of the work and of the Contract Documents, including all plans and specifications, and shall become informed as to the location and nature of the proposed Work, the kind of facilities required before and during the construction period, labor

conditions, and all other matters that may affect the cost and time of completion of the work.

10. CSLP reserves the right to issue one or more addenda, if necessary, prior to accepting bids for the work. Such addendum(s) shall be, and are hereby made a part of these specifications. Upon receipt of the addendum(s), the Bidder shall acknowledge receipt by listing the addendum(s) and signing in the appropriate spaces in the Proposal.
11. As part of Bidder's response to this RFP, Bidder shall submit preliminary drawings indicating areas of proposed seating and describing the number of seats, tread and riser dimensions, vomitory openings, aisle dimensions, requirement for ramps, seat type, seat width, sight lines for viewing of the center hung video board, design / procurement / manufacturing schedule, preliminary seat manifest, load-in / load out schedule and any other information Bidder feels is necessary to convey it's response to this RFP.

**DALLAS COWBOYS
ARLINGTON STADIUM**

Proposal Form

To: CSLP, Inc
1 Legends Way
Arlington, TX 76011
Attn: Jack Hill

Bid Time: _____ Bid Date: _____

Name of Bidder: _____

Bidder's Address: _____

Contact Person: _____

Telephone: _____ Fax: _____

E-mail Address: _____ Website: _____

We acknowledge the receipt of Bid Clarification: _____

The undersigned, having examined the Contract Documents and the site of the proposed Work and being familiar with all the conditions affecting the construction of the proposed project, hereby proposes and agrees to furnish all labor, material, equipment, supervision and other items necessary to perform and complete, in a workmanlike manner, all Work required by the Contract Documents, at the prices stated below and on subsequent pages.

The bidder agrees that it has had an opportunity to examine the site of the Work and has examined the Contract Documents, and that it has carefully prepared its proposal upon the basis thereof and that it has carefully examined and checked this bid and the materials, equipment and labor required there under, the cost thereof, and its figures therefore and hereby states that the amount or amounts set forth in this Bid is, or are, correct and that no mistake or error has occurred in this Bid or in the Bidder's computations upon which this Bid is based and the Bidder agrees that it will make no claim for reformation, modification, rescission, or correction of this Bid after the scheduled closing time for receipt of Bid.

The Bidder acknowledges that the Owner reserves the right to waive informalities and to reject any or all bids.

The Bidder agrees that the bid shall not be withdrawn or altered for a period of sixty (60) calendar days after the last date scheduled for the submission of bids.

By signing this bid, each Bidder certifies that this bid has been arrived at independently, without consultation, communication or agreement as to any matter relating to this bid with any other Bidder or with any competitor.

DALLAS COWBOYS
ARLINGTON STADIUM

This Proposal is for Bid Package – Temporary Seating System

BASE BID:

Total amount for the furnishing of all design, labor, materials, services, equipment and supervision required in conjunction with and properly incidental to the work as specifically shown or stated in Bid Documents and Project scope of Work. Bid Documents including but not limited to drawings and specifications. This Base Bid will be supported by a proposal which identifies what is included in the Base Bid and includes a detailed listing with an amount to each item.

Base Bid – Purchase System (Inclusive of insurance and tax):

_____ Dollars \$ _____
(Amount in Words) (Amount in Numbers)

Base Bid – Rental (Inclusive of insurance and tax):

_____ Dollars \$ _____
(Amount in Words) (Amount in Numbers)

(Authorized Signature)

(Printed Name/Title)

(Affix Corporate Seal Here)

LIST OF PRINCIPAL SUBCONTRACTORS AND VENDORS

[illegible]

SPECIFICATION
TEMPORARY SEATING SYSTEM

1. GENERAL:

- A. It is the intent of this specification to describe a temporary seating system in specific areas to create additional seating areas at locations as indicated on the drawings. Each area shall be designed to optimize sight lines and provide a positive fan experience for patrons attending events at Cowboys Stadium.

2. PERFORMANCE:

- A. Contractor shall require fabricator to be responsible for design and engineering of temporary seating system to meet specified performance requirements within physical and aesthetic requirements established herein.
- B. Drawings and Specification are an outline of criteria and performance requirements, do not necessarily indicate or specify total work required, may not cover some minor related conditions which may be otherwise required, and shall not be construed as engineered design. Requirements indicated by details or specified are intended to establish basic aspects of system, condition, dimensions, sight lines and profiles.
- C. Contractor to provide design and engineering for each component by employing a design engineer to prepare engineering calculations, shop drawings and other submittals, and other structural data; and to inspect completed installation.
- D. Contractor to provide evidence that proposed system complies with the egress requirements and exiting criteria established for Cowboys Stadium. Contractor's scope includes an updated code study verifying compliance.

3. STRUCTURAL PERFORMANCE:

- A. Design, engineer, fabricate, install and de-install temporary seating system to comply with code and capable of withstanding at a minimum, the following structural loads without exceeding the allowable design working stress of materials involved, including anchors and connections. Apply each load to produce the maximum stress in each component of metal pipe, seats, seating decks, structural frame and railings.
 - a. Seating decks: to comply with code, but not less than 125 pounds per square foot.
 - b. Railings:
 - i. Top Rails
 - 1. To comply with code, but not less than uniform load of 50 pounds per lineal foot applied in any direction at top and transfer to adjacent structure.
 - 2. To comply with code, but not less than single concentrated load of 200 foot pounds applied in any direction at any point along top and transfer to adjacent structure
 - 3. Uniform and concentrated loads need not be assumed to act concurrently.
 - ii. Intermediate Rails:
 - 1. To comply with code but not less than horizontally applied concentrated load of 50 foot pounds applied on an area of 1 square foot including openings and space between rails.
 - 2. Infill load and other loads need not be assumed to act concurrently.

4. SUBMITTALS

- A. Product Data: Submit manufacturer's product, specifications and describe features of each component. Submit technical data and performance test data certified by an independent testing laboratory and product information.
- B. Shop Drawings: Submit showing assembly layout, and including plans, elevations and details.

- C. Seating manifest: submit seating manifest detailing the size, location, number, type and style of each seat.
- D. Design Engineer Design Certification: Submit certification stating that design of components, is in compliance with provisions of Contract Documents and building code.

5. **FINISHES:**

- A. Deck treads, ramps, stairs and all walking surfaces will be an extruded raw aluminum finish with minimal factory handling defects. Decks to have non-slip finish.
- B. Architectural Class 1, Clear Anodized Finish; AA-M12C22A41 (Mechanical Finish: non-specular as fabricated; Chemical Finish: etched, medium matte; Anodic Coating; Architectural Class 1, clear film thicker than 0.7mil) complying with AAMA 607.1.

6. **MATERIALS:**

- A. Aluminum: Alloy temper, and thickness recommended by manufacturer for type of use and finish appropriate for the performance requirements.
 - a. Extruded Bars: Tubes and shapes: ASTM B 221
 - b. Plate and Sheet: ASTM B 209
- B. Fasteners: Vibration-resistant and vandal-resistant attachment and anchoring devices of corrosion-resistant material, type required to properly anchor or attach components.

7. **ACCEPTABLE MANUFACTURE:**

- A. Alternative systems must be approved prior to bidding by the owner or owner designative representatives and must be approved "as equal". Requirements of approval at a minimum will be a written narrative describing the proposed equal system. Specifications of components as well as samples will be required as well.
- B. A list of (5) successful installations of similar scope and size must be submitted for approval 10 days before bid date to include name of facility, contact name, contact phone number and email address if applying for an as equal status.
- C. Manufacture must have a minimum 5 years experience in the business of fabricating and installing portable platform systems.

6. **WARRANTY:**

- A. Manufacture must warrant each product to be free from defect in material and workmanship for a period of one (1) full year under normal use and service. Warranty begins upon substantial completion or upon first use of equipment which ever comes first.

7. **INSTALLATION:**

- A. Manufacture is responsible for all shipping of its products to site.
- B. Manufacture is responsible for a complete and final installation of all its product to include labor, tools and equipment, clean up, supervision, and coordination.

8. **EXISTING CONDITIONS:**

- A. Contractor acknowledges it's installation and de-installation will occur in an existing facility, as such, any repairs necessary to be made to existing finishes (whether architectural or structural) as a result of Contractor's installation or de-installation or any other work performed by Contractor, shall be the responsibility of the Contractor.

EXHIBIT "A"
COWBOYS STADIUM, LP
MINIMUM INSURANCE REQUIREMENTS

COMMERCIAL GENERAL LIABILITY (OCCURRENCE BASIS)

General Aggregate Limit	\$2,000,000
Products & Completed Operations Aggregate Limit (To be carried for one (1) year after completion of Project)	\$2,000,000
Personal Injury Limit	\$1,000,000
Each Occurrence Limit	\$1,000,000

Cowboys Stadium, LP, Dallas Cowboys Football Club, Ltd and all subsidiaries, related or affiliated companies, City of Arlington, TX are to be included as Additional Insureds (CG2010 11/85 Form or Equivalent) and such insurance shall be primary. Limits apply on a location basis.

Waiver of Subrogation in favor of Cowboys Stadium, LP, Dallas Cowboys Football Club, Ltd and all subsidiaries, related or affiliated companies, City of Arlington, TX.

BUSINESS AUTO LIABILITY

Combined Single Limit for Bodily Injury & Property Damage (Above to include Owned, Hired & Non-Owned Auto)	\$1,000,000
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Cowboys Stadium, LP, Dallas Cowboys Football Club, Ltd and all subsidiaries, related or affiliated companies, City of Arlington, TX are to be included as Additional Insureds.

WORKERS COMPENSATION/EMPLOYER'S LIABILITY

Each Accident	\$1,000,000
Disease Limit – Policy	\$1,000,000
Disease Limit - Each Employee	\$1,000,000

Waiver of Subrogation in favor of Cowboys Stadium, LP, Dallas Cowboys Football Club, Ltd and all subsidiaries, related or affiliated companies, City of Arlington, TX.

UMBRELLA LIABILITY

Combined Single Limit (Over/above General, Auto, and Employers Liability Limits)	\$3,000,000
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Cowboys Stadium, LP, Dallas Cowboys Football Club, Ltd and all subsidiaries, related or affiliated companies, City of Arlington, TX are to be included as Additional Insureds (CG2010 11/85 Form or Equivalent) and such insurance shall be primary. Limits apply on a location basis.

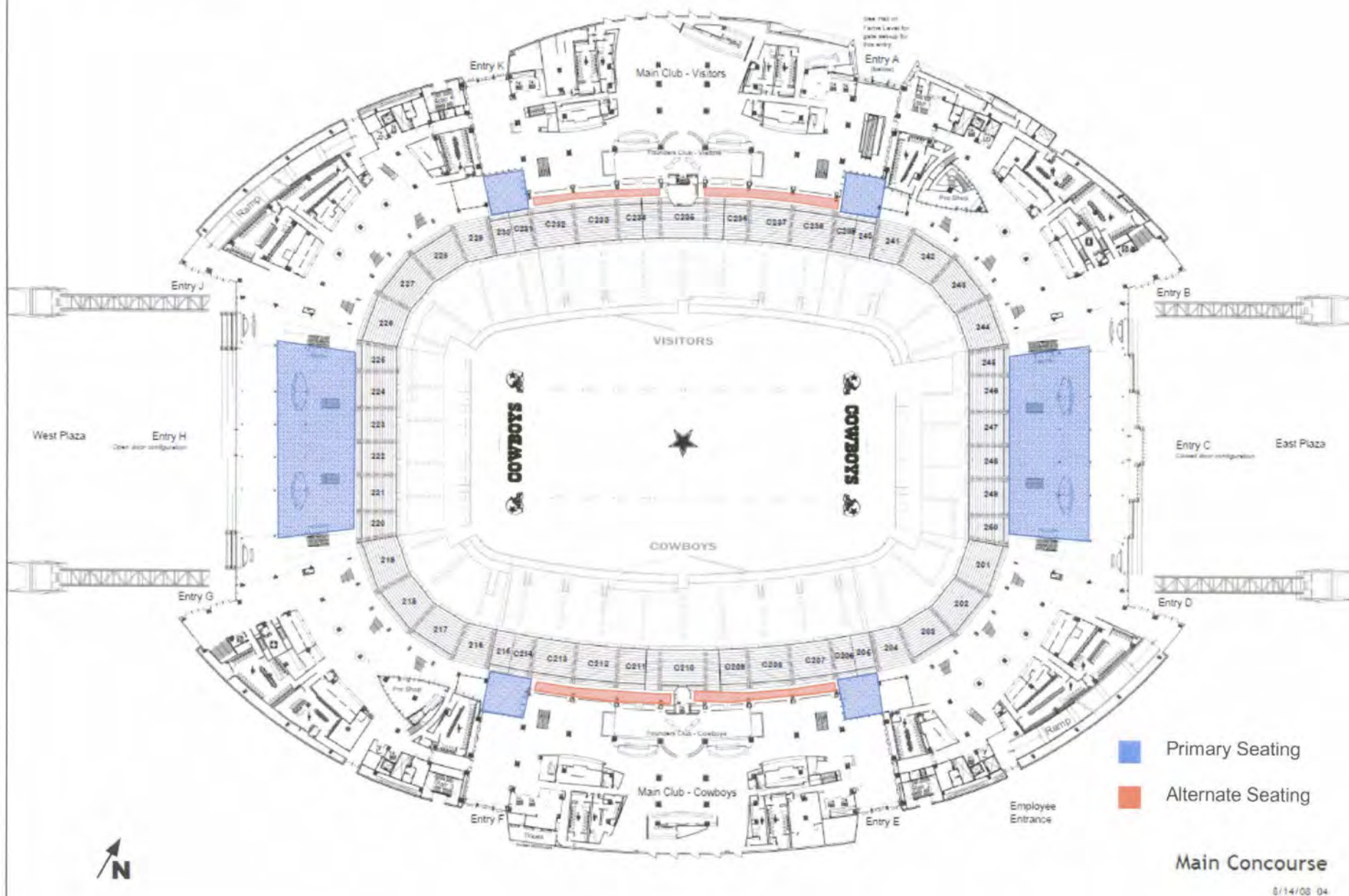
Waiver of Subrogation in favor of Cowboys Stadium, LP, Dallas Cowboys Football Club, Ltd and all subsidiaries, related or affiliated companies, City of Arlington, TX.

PROFESSIONAL LIABILITY

Each Occurrence Limit	\$2,000,000
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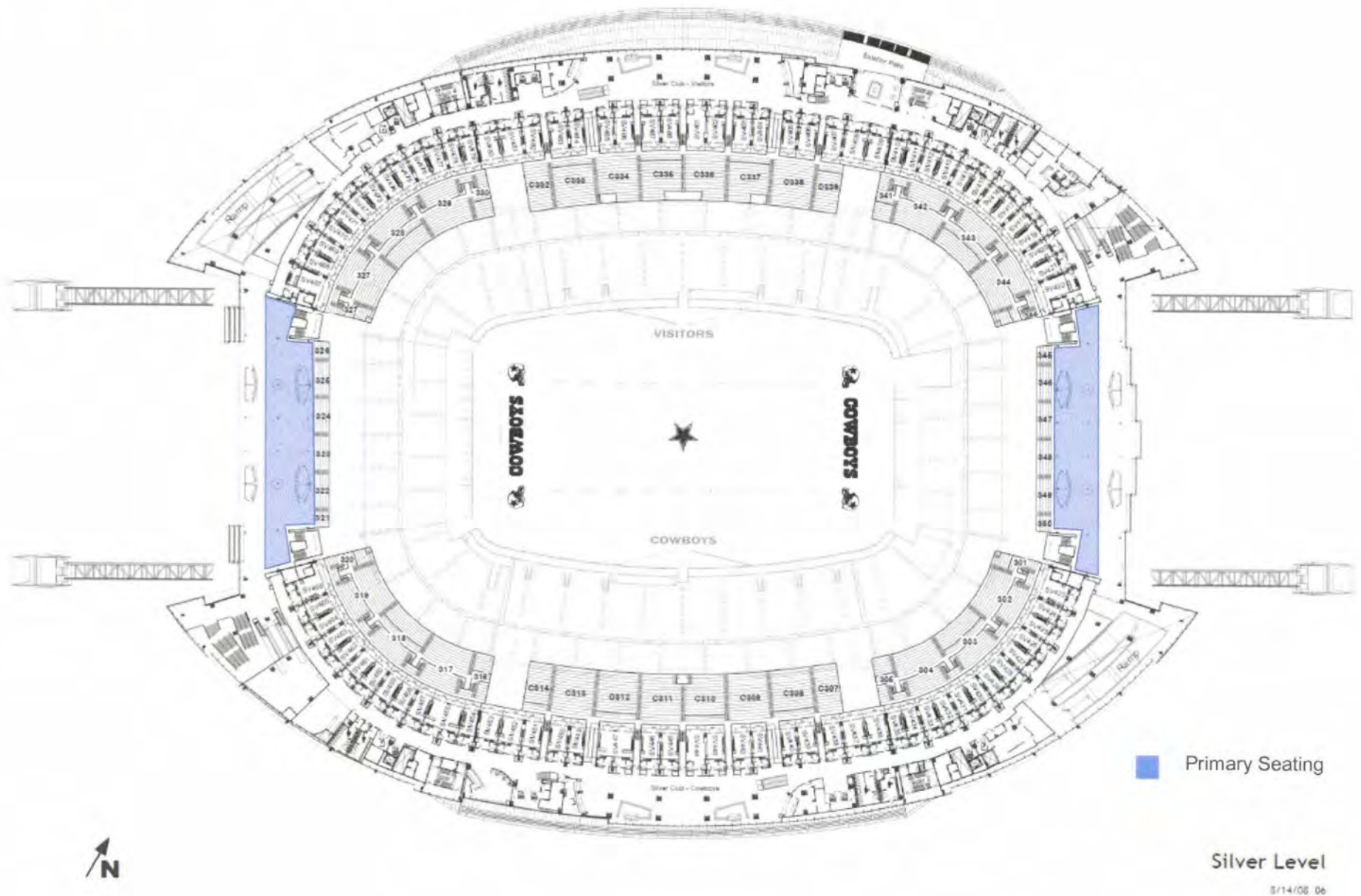


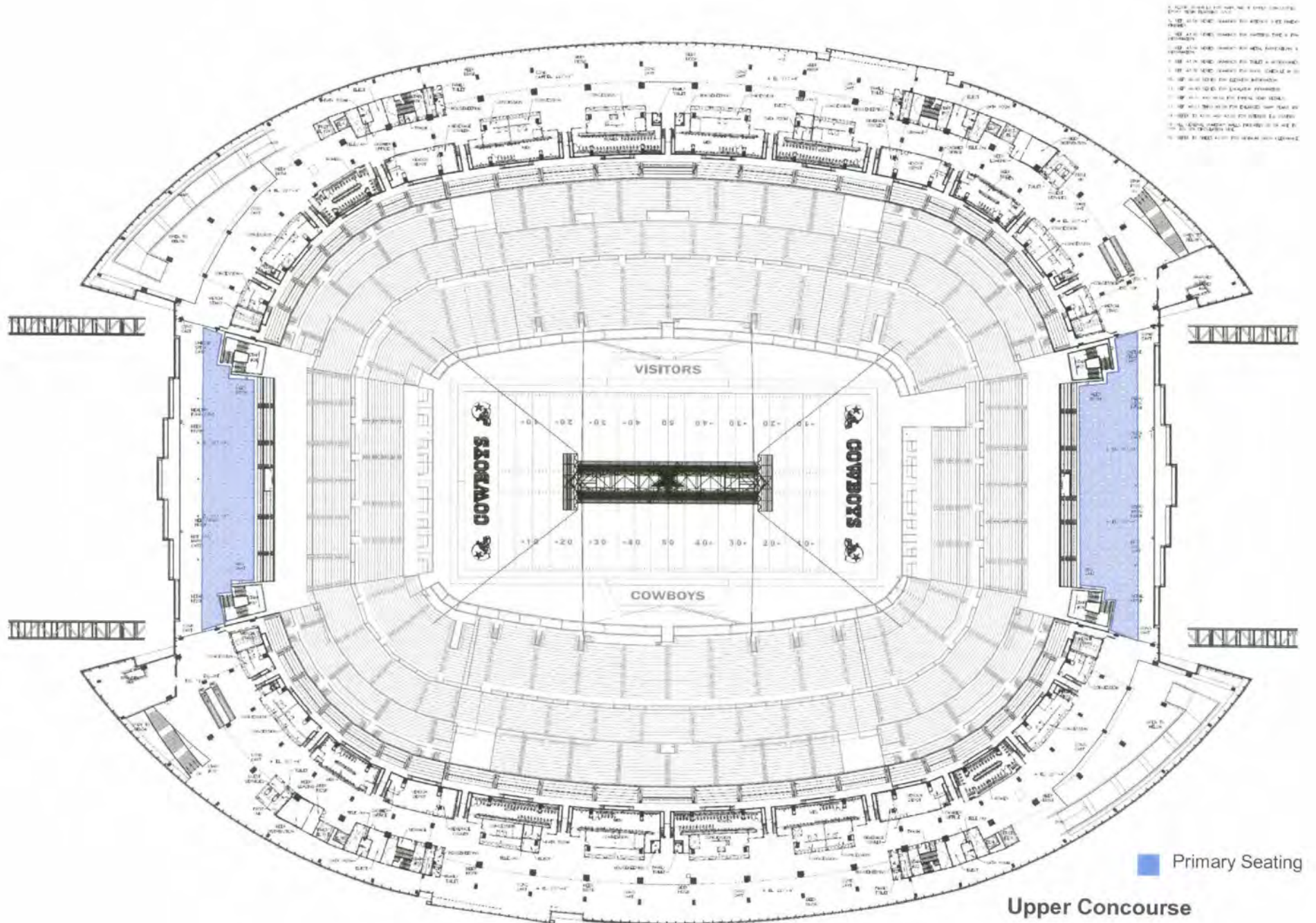
Dallas Cowboys New Stadium
Arlington, Texas

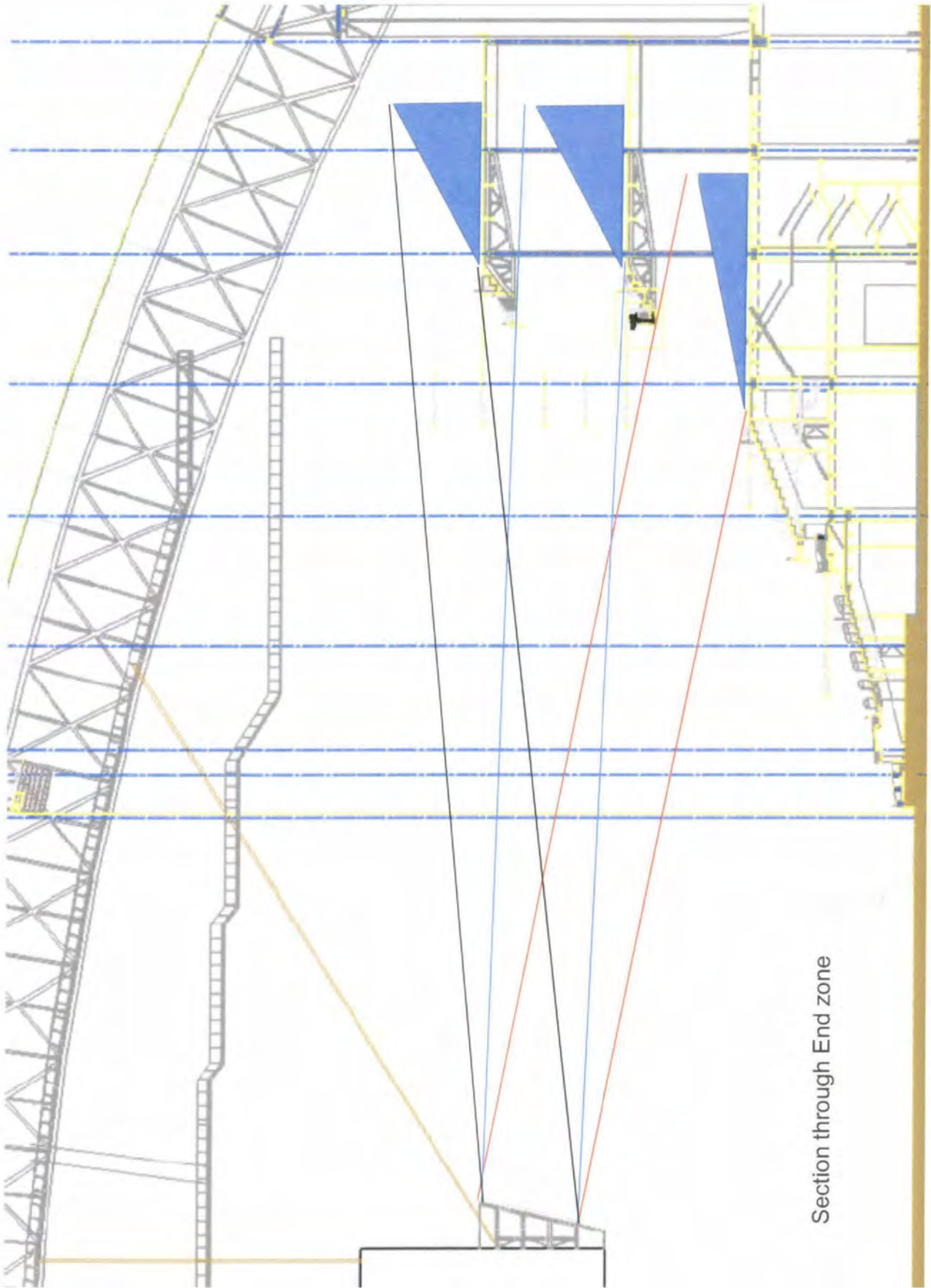




Dallas Cowboys New Stadium
Arlington, Texas







From: Otto, Fred </O=NFLNET/OU=NFL/CN=RECIPIENTS/CN=OTTOF>
Sent: Thursday, November 18, 2010 11:30 AM
To: Bihari, Ann <abihari@dallascowboys.net>
Subject: FW: Cowboys Allocations
Attach: Dallas Cowboys Restricted View Allocation.xlsx; Dallas Cowboys Regular Allocation.xlsx



Ann- hope all is well and thanks for all the hard work you have done for getting the manifest finalized.

Attached are the manifests for the 2 Cowboys allocations we have assigned.

On the regular manifest- 3,250 seats- would like you to keep in mind-

- ✓ A "normal" host team manifest is usually largely 400 level seats with a few better seats. As you can see we have assigned a large number of "better" seats to the Cowboys.
- ✓ A long standing practice of reducing the host team allocation by 325 seats per NFL resolution- has not been done- we are giving you the full 5%
- ✓ We have allocated a minimal amount of temp seats to the Cowboys- these are the seats with an A added to the section number

On the "restricted view" manifest we have assigned all these seats to the Cowboys. At a bargain price of \$600. Most of these seats will have a perfectly good view of the game. This , too is unprecedented.

Please share this with the Jones family, Brett Daniels, Chad Estis and whomever you see fit.

We hope this meets all expectations-

Thanks again

DOCUMENT INFO

Comments: Native File Produced

DOCUMENT INFO

event_name	section_name	row_name	seat_num	last_seat_r	num_seats	acct_id	name	price_code	purchase_price
SB45GAME	321A	16	21	22	2	709840	Dallas Cowboys	D	600
SB45GAME	321A	17	21	22	2	709840	Dallas Cowboys	D	600
SB45GAME	321A	18	20	22	3	709840	Dallas Cowboys	D	600
SB45GAME	321A	19	19	22	4	709840	Dallas Cowboys	D	600
SB45GAME	321A	20	18	22	5	709840	Dallas Cowboys	D	600
SB45GAME	321A	21	17	23	7	709840	Dallas Cowboys	D	600
SB45GAME	321A	22	15	23	9	709840	Dallas Cowboys	D	600
SB45GAME	321A	23	14	23	10	709840	Dallas Cowboys	D	600
SB45GAME	321A	24	13	23	11	709840	Dallas Cowboys	D	600
SB45GAME	321A	25	12	23	12	709840	Dallas Cowboys	D	600
SB45GAME	321A	26	11	23	13	709840	Dallas Cowboys	D	600
SB45GAME	321A	27	10	23	14	709840	Dallas Cowboys	D	600
SB45GAME	321A	28	9	23	15	709840	Dallas Cowboys	D	600
SB45GAME	321A	29	8	23	16	709840	Dallas Cowboys	D	600
SB45GAME	321A	30	7	23	17	709840	Dallas Cowboys	D	600
SB45GAME	321A	31	6	23	18	709840	Dallas Cowboys	D	600
SB45GAME	322A	16	18	19	2	709840	Dallas Cowboys	D	600
SB45GAME	322A	17	17	19	3	709840	Dallas Cowboys	D	600
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SB45GAME	322A	25	5	6	2	709840	Dallas Cowboys	D	600
SB45GAME	322A	25	11	19	9	709840	Dallas Cowboys	D	600
SB45GAME	322A	26	5	6	2	709840	Dallas Cowboys	D	600
SB45GAME	322A	26	10	19	10	709840	Dallas Cowboys	D	600
SB45GAME	322A	27	5	6	2	709840	Dallas Cowboys	D	600

SB45GAME	322A	27	9	19	11	709840	Dallas Cowboys	D	600
SB45GAME	322A	28	5	19	15	709840	Dallas Cowboys	D	600
SB45GAME	322A	29	5	19	15	709840	Dallas Cowboys	D	600
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SB45GAME	323A	21	4	6	3	709840	Dallas Cowboys	D	600
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SB45GAME	323A	22	4	6	3	709840	Dallas Cowboys	D	600
SB45GAME	323A	22	15	18	4	709840	Dallas Cowboys	D	600
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SB45GAME	348A	23	3	9	7	709840 Dallas Cowboys	D	600
SB45GAME	348A	23	16	17	2	709840 Dallas Cowboys	D	600
SB45GAME	348A	24	3	10	8	709840 Dallas Cowboys	D	600
SB45GAME	348A	24	16	17	2	709840 Dallas Cowboys	D	600
SB45GAME	348A	25	3	10	8	709840 Dallas Cowboys	D	600
SB45GAME	348A	25	16	17	2	709840 Dallas Cowboys	D	600
SB45GAME	348A	26	3	11	9	709840 Dallas Cowboys	D	600
SB45GAME	348A	26	16	17	2	709840 Dallas Cowboys	D	600
SB45GAME	348A	27	3	12	10	709840 Dallas Cowboys	D	600
SB45GAME	348A	27	16	17	2	709840 Dallas Cowboys	D	600
SB45GAME	348A	28	3	17	15	709840 Dallas Cowboys	D	600
SB45GAME	348A	29	3	17	15	709840 Dallas Cowboys	D	600

SB45GAME	348A	30	3	17	15	709840 Dallas Cowboys	D	600
SB45GAME	348A	31	3	17	15	709840 Dallas Cowboys	D	600
SB45GAME	349A	16	3	4	2	709840 Dallas Cowboys	D	600
SB45GAME	349A	17	3	4	2	709840 Dallas Cowboys	D	600
SB45GAME	349A	18	3	5	3	709840 Dallas Cowboys	D	600
SB45GAME	349A	19	3	6	4	709840 Dallas Cowboys	D	600
SB45GAME	349A	20	3	7	5	709840 Dallas Cowboys	D	600
SB45GAME	349A	21	2	8	7	709840 Dallas Cowboys	D	600
SB45GAME	349A	22	2	10	9	709840 Dallas Cowboys	D	600
SB45GAME	349A	23	2	11	10	709840 Dallas Cowboys	D	600
SB45GAME	349A	24	2	12	11	709840 Dallas Cowboys	D	600
SB45GAME	349A	25	2	13	12	709840 Dallas Cowboys	D	600
SB45GAME	349A	26	2	14	13	709840 Dallas Cowboys	D	600
SB45GAME	349A	27	2	16	15	709840 Dallas Cowboys	D	600
SB45GAME	349A	28	2	18	17	709840 Dallas Cowboys	D	600
SB45GAME	349A	29	2	18	17	709840 Dallas Cowboys	D	600
SB45GAME	349A	30	2	18	17	709840 Dallas Cowboys	D	600
SB45GAME	349A	31	2	19	18	709840 Dallas Cowboys	D	600

DOCUMENT INFO

Comments: Native File Produced

DOCUMENT INFO

event_name	section_name	row_name	seat_num	last_seat_r	num_seats	acct_id	name	price_code	purchase_price
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SB45GAME	101	11	1	3	3	523928	Dallas Cowboys	B	900
SB45GAME	102	13	1	20	20	523928	Dallas Cowboys	B	900
SB45GAME	103	4	1	8	8	523928	Dallas Cowboys	B	900
SB45GAME	118	4	2	4	3	523928	Dallas Cowboys	B	900
SB45GAME	118	5	2	4	3	523928	Dallas Cowboys	B	900
SB45GAME	118	7	1	2	2	523928	Dallas Cowboys	B	900
SB45GAME	119	14	1	20	20	523928	Dallas Cowboys	B	900
SB45GAME	120	5	1	12	12	523928	Dallas Cowboys	B	900
SB45GAME	121	17	1	10	10	523928	Dallas Cowboys	B	900
SB45GAME	122	16	1	8	8	523928	Dallas Cowboys	B	900
SB45GAME	123	12	1	8	8	523928	Dallas Cowboys	B	900
SB45GAME	128	6	10	21	12	523928	Dallas Cowboys	B	900
SB45GAME	128	6	22	22	1	523928	Dallas Cowboys	B	900
SB45GAME	128	7	21	22	2	523928	Dallas Cowboys	B	900
SB45GAME	128	15	1	22	22	523928	Dallas Cowboys	B	900
SB45GAME	128	15	23	23	1	523928	Dallas Cowboys	B	900
SB45GAME	128	16	19	22	4	523928	Dallas Cowboys	B	900
SB45GAME	128	16	23	23	1	523928	Dallas Cowboys	B	900
SB45GAME	128	17	21	22	2	523928	Dallas Cowboys	B	900
SB45GAME	128	17	23	23	1	523928	Dallas Cowboys	B	900
SB45GAME	128	18	1	23	23	523928	Dallas Cowboys	B	900
SB45GAME	128	19	1	23	23	523928	Dallas Cowboys	B	900
SB45GAME	128	20	1	23	23	523928	Dallas Cowboys	B	900
SB45GAME	128	21	1	23	23	523928	Dallas Cowboys	B	900
SB45GAME	144	5	1	15	15	523928	Dallas Cowboys	B	900
SB45GAME	144	8	1	19	19	523928	Dallas Cowboys	B	900
SB45GAME	144	9	1	20	20	523928	Dallas Cowboys	B	900
SB45GAME	144	10	3	21	19	523928	Dallas Cowboys	B	900
SB45GAME	144	13	5	25	21	523928	Dallas Cowboys	B	900
SB45GAME	144	14	25	26	2	523928	Dallas Cowboys	B	900
SB45GAME	144	15	9	27	19	523928	Dallas Cowboys	B	900
SB45GAME	144	18	1	31	31	523928	Dallas Cowboys	B	900
SB45GAME	149	18	1	10	10	523928	Dallas Cowboys	B	900

SB45GAME	150	14	1	7	7	523928	Dallas Cowboys	B	900
SB45GAME	150	15	1	3	3	523928	Dallas Cowboys	B	900
SB45GAME	201	14	1	18	18	523928	Dallas Cowboys	B	900
SB45GAME	201	15	1	2	2	523928	Dallas Cowboys	B	900
SB45GAME	202	13	1	5	5	523928	Dallas Cowboys	B	900
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SB45GAME	218	4	1	5	5	523928	Dallas Cowboys	B	900
SB45GAME	219	11	1	18	18	523928	Dallas Cowboys	B	900
SB45GAME	221	12	1	16	16	523928	Dallas Cowboys	B	900
SB45GAME	222	1	1	10	10	523928	Dallas Cowboys	B	900
SB45GAME	248	8	1	10	10	523928	Dallas Cowboys	B	900
SB45GAME	249	1	13	20	8	523928	Dallas Cowboys	B	900
SB45GAME	249	2	11	20	10	523928	Dallas Cowboys	B	900
SB45GAME	401	2	1	6	6	523928	Dallas Cowboys	B	900
SB45GAME	402	5	13	14	2	523928	Dallas Cowboys	B	900
SB45GAME	402	6	9	14	6	523928	Dallas Cowboys	B	900
SB45GAME	403	23	12	21	10	523928	Dallas Cowboys	C	800
SB45GAME	404	6	1	10	10	523928	Dallas Cowboys	B	900
SB45GAME	404	14	1	10	10	523928	Dallas Cowboys	C	800
SB45GAME	405	24	1	10	10	523928	Dallas Cowboys	C	800
SB45GAME	406	5	1	10	10	523928	Dallas Cowboys	B	900
SB45GAME	406	18	1	10	10	523928	Dallas Cowboys	C	800
SB45GAME	407	19	1	10	10	523928	Dallas Cowboys	C	800
SB45GAME	408	1	1	25	25	523928	Dallas Cowboys	B	900
SB45GAME	408	2	1	25	25	523928	Dallas Cowboys	B	900
SB45GAME	408	3	1	25	25	523928	Dallas Cowboys	B	900
SB45GAME	408	14	1	10	10	523928	Dallas Cowboys	C	800

SB45GAME	409	1	1	22	22	523928	Dallas Cowboys	B	900
SB45GAME	409	1	23	23	1	523928	Dallas Cowboys	B	900
SB45GAME	409	2	1	22	22	523928	Dallas Cowboys	B	900
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SB45GAME	409	3	1	22	22	523928	Dallas Cowboys	B	900
SB45GAME	409	3	23	23	1	523928	Dallas Cowboys	B	900
SB45GAME	409	4	1	22	22	523928	Dallas Cowboys	B	900
SB45GAME	409	4	23	23	1	523928	Dallas Cowboys	B	900
SB45GAME	409	5	1	22	22	523928	Dallas Cowboys	B	900
SB45GAME	409	5	23	23	1	523928	Dallas Cowboys	B	900
SB45GAME	409	6	1	22	22	523928	Dallas Cowboys	B	900
SB45GAME	409	6	23	23	1	523928	Dallas Cowboys	B	900
SB45GAME	409	16	1	3	3	523928	Dallas Cowboys	C	800
SB45GAME	409	17	1	7	7	523928	Dallas Cowboys	C	800
SB45GAME	410	16	1	10	10	523928	Dallas Cowboys	C	800
SB45GAME	411	20	1	10	10	523928	Dallas Cowboys	C	800
SB45GAME	412	19	11	20	10	523928	Dallas Cowboys	C	800
SB45GAME	413	13	16	25	10	523928	Dallas Cowboys	C	800
SB45GAME	414	1	1	28	28	523928	Dallas Cowboys	B	900
SB45GAME	414	2	1	28	28	523928	Dallas Cowboys	B	900
SB45GAME	414	3	1	28	28	523928	Dallas Cowboys	B	900
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SB45GAME	414	5	29	29	1	523928	Dallas Cowboys	B	900
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SB45GAME	414	6	29	29	1	523928	Dallas Cowboys	B	900
SB45GAME	414	11	1	5	5	523928	Dallas Cowboys	C	800
SB45GAME	414	12	1	5	5	523928	Dallas Cowboys	C	800
SB45GAME	415	1	1	17	17	523928	Dallas Cowboys	B	900
SB45GAME	415	20	11	20	10	523928	Dallas Cowboys	C	800
SB45GAME	416	11	1	10	10	523928	Dallas Cowboys	C	800
SB45GAME	417	1	1	3	3	523928	Dallas Cowboys	B	900
SB45GAME	417	2	1	3	3	523928	Dallas Cowboys	B	900
SB45GAME	417	19	1	10	10	523928	Dallas Cowboys	C	800
SB45GAME	418	6	1	12	12	523928	Dallas Cowboys	B	900

SB45GAME	418	26	17	25	9	523928	Dallas Cowboys	C	800
SB45GAME	418	26	26	26	1	523928	Dallas Cowboys	C	800
SB45GAME	419	19	11	20	10	523928	Dallas Cowboys	C	800
SB45GAME	420	1	7	12	6	523928	Dallas Cowboys	B	900
SB45GAME	420	9	1	10	10	523928	Dallas Cowboys	C	800
SB45GAME	421	10	7	16	10	523928	Dallas Cowboys	C	800
SB45GAME	422	14	11	20	10	523928	Dallas Cowboys	C	800
SB45GAME	423	1	1	17	17	523928	Dallas Cowboys	B	900
SB45GAME	423	2	1	6	6	523928	Dallas Cowboys	B	900
SB45GAME	423	9	7	20	14	523928	Dallas Cowboys	C	800
SB45GAME	423	10	7	20	14	523928	Dallas Cowboys	C	800
SB45GAME	423	11	6	20	15	523928	Dallas Cowboys	C	800
SB45GAME	423	12	6	20	15	523928	Dallas Cowboys	C	800
SB45GAME	423	13	6	20	15	523928	Dallas Cowboys	C	800
SB45GAME	423	14	1	20	20	523928	Dallas Cowboys	C	800
SB45GAME	423	15	1	20	20	523928	Dallas Cowboys	C	800
SB45GAME	423	15	21	21	1	523928	Dallas Cowboys	C	800
SB45GAME	423	16	1	21	21	523928	Dallas Cowboys	C	800
SB45GAME	423	17	1	21	21	523928	Dallas Cowboys	C	800
SB45GAME	423	18	1	21	21	523928	Dallas Cowboys	C	800
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SB45GAME	423	21	23	23	1	523928	Dallas Cowboys	C	800
SB45GAME	423	22	1	25	25	523928	Dallas Cowboys	C	800
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SB45GAME	432	10	1	14	14	523928	Dallas Cowboys	C	800
SB45GAME	432	11	1	15	15	523928	Dallas Cowboys	C	800
SB45GAME	432	12	1	15	15	523928	Dallas Cowboys	C	800
SB45GAME	432	13	1	15	15	523928	Dallas Cowboys	C	800
SB45GAME	432	14	1	20	20	523928	Dallas Cowboys	C	800
SB45GAME	432	15	1	20	20	523928	Dallas Cowboys	C	800
SB45GAME	432	15	21	21	1	523928	Dallas Cowboys	C	800

SB45GAME	432	16	1	21	21	523928	Dallas Cowboys	C	800
SB45GAME	432	17	1	21	21	523928	Dallas Cowboys	C	800
SB45GAME	432	18	1	21	21	523928	Dallas Cowboys	C	800
SB45GAME	432	18	22	22	1	523928	Dallas Cowboys	C	800
SB45GAME	432	19	1	22	22	523928	Dallas Cowboys	C	800
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SB45GAME	432	21	23	23	1	523928	Dallas Cowboys	C	800
SB45GAME	432	22	1	25	25	523928	Dallas Cowboys	C	800
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SB45GAME	440	3	1	22	22	523928	Dallas Cowboys	B	900
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SB45GAME	440	4	1	22	22	523928	Dallas Cowboys	B	900
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SB45GAME	440	5	1	22	22	523928	Dallas Cowboys	B	900
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SB45GAME	440	6	1	22	22	523928	Dallas Cowboys	B	900
SB45GAME	440	6	23	23	1	523928	Dallas Cowboys	B	900
SB45GAME	447	1	1	25	25	523928	Dallas Cowboys	B	900
SB45GAME	447	2	1	25	25	523928	Dallas Cowboys	B	900
SB45GAME	447	3	1	25	25	523928	Dallas Cowboys	B	900
SB45GAME	448	4	1	10	10	523928	Dallas Cowboys	B	900
SB45GAME	448	6	1	9	9	523928	Dallas Cowboys	B	900
SB45GAME	222A	43	3	9	7	523928	Dallas Cowboys	B	900
SB45GAME	222A	44	3	13	11	523928	Dallas Cowboys	B	900
SB45GAME	321A	23	1	3	3	523928	Dallas Cowboys	B	900
SB45GAME	321A	24	1	3	3	523928	Dallas Cowboys	B	900
SB45GAME	321A	25	1	3	3	523928	Dallas Cowboys	B	900
SB45GAME	321A	26	1	3	3	523928	Dallas Cowboys	B	900

SB45GAME	322A	11	3	4	2	523928	Dallas Cowboys	B	900
SB45GAME	457A	11	1	24	24	523928	Dallas Cowboys	C	800
SB45GAME	457A	12	3	22	20	523928	Dallas Cowboys	C	800
SB45GAME	457A	13	3	22	20	523928	Dallas Cowboys	C	800
SB45GAME	457A	14	3	22	20	523928	Dallas Cowboys	C	800
SB45GAME	457A	15	3	22	20	523928	Dallas Cowboys	C	800
SB45GAME	457A	16	3	22	20	523928	Dallas Cowboys	C	800
SB45GAME	457A	17	3	22	20	523928	Dallas Cowboys	C	800
SB45GAME	457A	18	3	22	20	523928	Dallas Cowboys	C	800
SB45GAME	457A	19	1	27	27	523928	Dallas Cowboys	C	800
SB45GAME	C107	9	7	20	14	523928	Dallas Cowboys	A	1200
SB45GAME	C107	9	21	21	1	523928	Dallas Cowboys	A	1200
SB45GAME	C107	10	1	20	20	523928	Dallas Cowboys	A	1200
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SB45GAME	C107	11	21	21	1	523928	Dallas Cowboys	A	1200
SB45GAME	C108	11	1	6	6	523928	Dallas Cowboys	A	1200
SB45GAME	C109	1	3	8	6	523928	Dallas Cowboys	A	1200
SB45GAME	C109	17	1	20	20	523928	Dallas Cowboys	A	1200
SB45GAME	C109	17	21	21	1	523928	Dallas Cowboys	A	1200
SB45GAME	C109	18	7	20	14	523928	Dallas Cowboys	A	1200
SB45GAME	C109	18	21	21	1	523928	Dallas Cowboys	A	1200
SB45GAME	C110	2	1	8	8	523928	Dallas Cowboys	A	1200
SB45GAME	C110	17	1	10	10	523928	Dallas Cowboys	A	1200
SB45GAME	C110	17	11	20	10	523928	Dallas Cowboys	A	1200
SB45GAME	C110	17	21	21	1	523928	Dallas Cowboys	A	1200
SB45GAME	C110	18	1	10	10	523928	Dallas Cowboys	A	1200
SB45GAME	C110	18	11	20	10	523928	Dallas Cowboys	A	1200
SB45GAME	C110	18	21	21	1	523928	Dallas Cowboys	A	1200
SB45GAME	C111	8	3	8	6	523928	Dallas Cowboys	A	1200
SB45GAME	C112	8	1	6	6	523928	Dallas Cowboys	A	1200
SB45GAME	C113	6	3	8	6	523928	Dallas Cowboys	A	1200
SB45GAME	C207	1	11	20	10	523928	Dallas Cowboys	A	1200
SB45GAME	C207A	21	3	19	17	523928	Dallas Cowboys	A	1200
SB45GAME	C207A	22	3	19	17	523928	Dallas Cowboys	A	1200

SB45GAME	C207A	23	3	19	17	523928	Dallas Cowboys	A	1200
SB45GAME	C207A	24	1	21	21	523928	Dallas Cowboys	A	1200
SB45GAME	C208	10	1	6	6	523928	Dallas Cowboys	A	1200
SB45GAME	C208A	21	3	19	17	523928	Dallas Cowboys	A	1200
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SB45GAME	C210	4	1	6	6	523928	Dallas Cowboys	A	1200
SB45GAME	C210	4	25	32	8	523928	Dallas Cowboys	A	1200
SB45GAME	C210	4	35	40	6	523928	Dallas Cowboys	A	1200
SB45GAME	C210	5	1	6	6	523928	Dallas Cowboys	A	1200
SB45GAME	C210	5	9	32	24	523928	Dallas Cowboys	A	1200
SB45GAME	C210	5	33	33	1	523928	Dallas Cowboys	A	1200
SB45GAME	C210	5	35	40	6	523928	Dallas Cowboys	A	1200
SB45GAME	C210	6	9	32	24	523928	Dallas Cowboys	A	1200
SB45GAME	C210	6	33	33	1	523928	Dallas Cowboys	A	1200
SB45GAME	C211A	21	3	19	17	523928	Dallas Cowboys	A	1200
SB45GAME	C211A	22	3	19	17	523928	Dallas Cowboys	A	1200
SB45GAME	C211A	23	3	19	17	523928	Dallas Cowboys	A	1200
SB45GAME	C211A	24	1	21	21	523928	Dallas Cowboys	A	1200
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SB45GAME	C212A	22	3	19	17	523928	Dallas Cowboys	A	1200
SB45GAME	C212A	23	3	19	17	523928	Dallas Cowboys	A	1200
SB45GAME	C212A	24	1	21	21	523928	Dallas Cowboys	A	1200
SB45GAME	C213	8	1	8	8	523928	Dallas Cowboys	A	1200
SB45GAME	C213	10	1	22	22	523928	Dallas Cowboys	A	1200
SB45GAME	C213	13	5	22	18	523928	Dallas Cowboys	A	1200
SB45GAME	C213	13	23	23	1	523928	Dallas Cowboys	A	1200
SB45GAME	C213	14	1	22	22	523928	Dallas Cowboys	A	1200

SB45GAME	C213	14	23	23	1	523928	Dallas Cowboys	A	1200
SB45GAME	C213	15	4	20	17	523928	Dallas Cowboys	A	1200
SB45GAME	C213A	21	3	19	17	523928	Dallas Cowboys	A	1200
SB45GAME	C213A	22	3	19	17	523928	Dallas Cowboys	A	1200
SB45GAME	C213A	23	3	19	17	523928	Dallas Cowboys	A	1200
SB45GAME	C213A	24	1	21	21	523928	Dallas Cowboys	A	1200
SB45GAME	C307	9	1	10	10	523928	Dallas Cowboys	A	1200
SB45GAME	C308	13	1	12	12	523928	Dallas Cowboys	A	1200
SB45GAME	C309	11	11	20	10	523928	Dallas Cowboys	A	1200
SB45GAME	C310	9	9	16	8	523928	Dallas Cowboys	A	1200
SB45GAME	C311	9	7	12	6	523928	Dallas Cowboys	A	1200
SB45GAME	C312	4	1	10	10	523928	Dallas Cowboys	A	1200
SB45GAME	C313	8	1	7	7	523928	Dallas Cowboys	A	1200
SB45GAME	C313	9	1	5	5	523928	Dallas Cowboys	A	1200
SB45GAME	C314	1	1	7	7	523928	Dallas Cowboys	A	1200
SB45GAME	C314	2	1	3	3	523928	Dallas Cowboys	A	1200

3250